

EPA Reg. No. 49784-4
Vol. 2

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 49784-4
formerly 9468-3/

Send to SIG: check box ☐

This material is:

€ New stamped-accepted label

€ New CSF

€ Notification

€ Final Printed Label

€ Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be **NO STAPLES** in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: _____

Phone: _____ **Division:** _____

Date: _____

PRODUCT REREGISTRATION

SUPPORTING DOCUMENTATION

m614324

FOR

Case Name: 49784-4

Reg. No. formerly 9468-31

This supporting documentation (in chronological order) includes:

- Old labels (identified as "Superseded by label dated xx/xx/xx")
- Unacceptable CSFs (marked "Not Acceptable" and dated)
- Product chemistry reviews
- Acute Toxicity reviews
- Efficacy reviews (if necessary)
- 90-day responses to PDCI (Form A and Form B)
- Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
- Correspondence



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 6, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

RESEARCH LABORATORIES, INC.
PO Box 801854
HOUSTON, TX 77280-1854

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 04-MAR-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

**WASHINGTON**

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

March 3, 2009

RE: Ritter's Flea and Tick Spray (formerly EPA Reg. No. 9468-31 – now EPA Reg. No. 49784-4)

MGK 326 Data Call In: Response to EPA Letter dated June 9, 2008

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Research Laboratories, Inc. (RLI), Technology Sciences Group is submitting the enclosed storage stability and corrosion study to complete the data gaps and support the re-registration of the above referenced product. Ritter Chemical LLC has transferred the product to RLI as of February 4, 2009 (please see the official transfer letter from Louis Vaughn dated February 4, 2009).

You will find the following included:

- 1) EPA application form,
- 2) Transmittal document,
- 3) Three copies of the storage stability study, and
- 4) A letter authorizing TSG to act on behalf of Research Laboratories, Inc.

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC/Research Laboratories, Inc.

VOLUME 1 OF 2 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Research Laboratories, Inc.
PO Box 801854
Houston, TX 77280-1854

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Re-registration Eligibility Decision

Submission of Storage Stability Study - Final Report

TRANSMITTAL DATE:

March 3, 2009

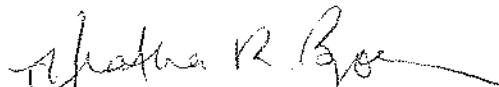
LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 2	(Transmittal Document)	-----
47693301	2 of 2	Storage Stability for <i>Ritter's Flea & Tick Spray</i> (Final Report)	830.6317, 830.6320

COMPANY NAME:

Research Laboratories, Inc.

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945

Research Laboratories, Inc.

P. O. Box 801854
Houston, Texas 77280-1854

February 12, 2009

Document Processing Desk (COADR)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

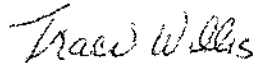
RE: Research Laboratories, Inc.
Letter of Authorization

Research Laboratories, Inc. has an agreement with Technology Sciences Group, Inc. (TSG) to provide regulatory assistance regarding the registration of pesticide products. With this letter we confirm TSG as an authorized agent in all matters concerning the registration of pesticide products with the Agency. This letter constitutes authorization of the Office of Pesticide Programs to discuss the status of these registrations and supporting data with representatives of TSG, including disclosure of trade secret information, and acknowledges that official correspondence from the Office of Pesticide Programs can be directed to the agent. Please note, however, that the company address remains the official mailing address for EPA purposes. The full name and mailing address of the agent is as follows:

Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th St., N.W., Suite 1000
Washington, DC 20036
Tel (202) 828-8945
Fax (202) 872-0745
Email:

If there are any questions or comments please contact Traci Willis, Secretary/Treasurer of Research Laboratories, Inc. Tel: (713) 461-4261, Fax: (713) 461-5245 or Email

Sincerely,



Traci Willis
Secretary/Treasurer of Research Laboratories, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 49784-4	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Research Laboratories, Inc. PO Box 801854 Houston, TX 77280-1854 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. [For section I and Section II.]

This submission is the complete one-year storage stability and corrosion study to complete the re-registration of this product as part of the MGK 326 DCI. This submission is not subject to PRIA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Research Laboratories, Inc.	
4. Typed Name Heather R. Bjornson		5. Date March 3, 2009	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 4, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MR. VON S. WELLS
RESEARCH LABORATORIES, INC.
PO Box 801854
HOUSTON, TX 77280-1854

Dear Mr. Wells:

Subject: Transfer of Pesticide Registrations and Data From Company Number 9468 to
Company Number 49784

Pursuant to your request in your letter and transfer agreement of June 18, 2007 and
subsequently received information, we have approved the transfer of the following registrations
from **RITTER CHEMICAL, LLC**, company number 9468 to **RESEARCH
LABORATORIES, INC.**, company number 49784.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
RITTER'S FLEA & TICK SPRAY	9468-31	49784-4

You should indicate the new company designation, new EPA Registration Number and
new Establishment Number (if it has changed) on the labeling at the next printing which should
occur no later than 18 months after the effective date of this transfer. After 18 months, any
product released for shipment must bear the new Registration Number and Establishment
Number. If you intend to use the labels which currently appear on the transferor's product after
the effective date of the transfer, but within the 18 month grace period, you must maintain
complete and accurate records which identify by batch number, lot number, or other suitable
description the quantities of such product bearing the transferor's label. Each container or
package bearing the transferor's label which is released after the effective date of product
registration transfer, must be clearly and accurately marked with the batch number, lot number or
other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the
Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental
distributors of the transferred product(s) of this transfer agreement. If you wish to enter into
supplemental distribution agreements of your product(s) under this new registration, the form
"Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5,

must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

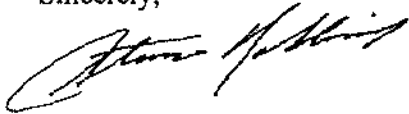
Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges that it has received a request for data transfer dated June 18, 2007, and subsequently submitted information, to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **RESEARCH LABORATORIES, INC.** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MS. HEATHER R. BJORNSON
TECHNOLOGY SCIENCES GROUP, INC, AGENT FOR
RITTER CHEMICAL, LLC
1150 18TH ST., N.W., SUITE 1000
WASHINGTON, DC 20036

L_9468_RAD_49784_02_04_2009

**WASHINGTON**

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

March 3, 2009

RE: Ritter's Flea and Tick Spray (formerly EPA Reg. No. 9468-31 – now EPA Reg. No. 49784-4)

MGK 326 Data Call In: Response to EPA Letter dated June 9, 2008

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Research Laboratories, Inc. (RLI), Technology Sciences Group is submitting the enclosed storage stability and corrosion study to complete the data gaps and support the re-registration of the above referenced product. Ritter Chemical LLC has transferred the product to RLI as of February 4, 2009 (please see the official transfer letter from Louis Vaughn dated February 4, 2009).

You will find the following included:

- 1) EPA application form,
- 2) Transmittal document,
- 3) Three copies of the storage stability study, and
- 4) A letter authorizing TSG to act on behalf of Research Laboratories, Inc.

CANADA

275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC/Research Laboratories, Inc.

VOLUME 1 OF 2 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Research Laboratories, Inc.
PO Box 801854
Houston, TX 77280-1854

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Re-registration Eligibility Decision

Submission of Storage Stability Study - Final Report

TRANSMITTAL DATE:

March 3, 2009

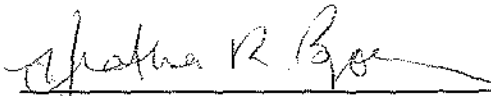
LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 2	(Transmittal Document)	-----
47693301	2 of 2	Storage Stability for Ritter's Flea & Tick Spray (Final Report)	830.6317, 830.6320

COMPANY NAME:

Research Laboratories, Inc.

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945



WASHINGTON

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

December 10, 2008

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Voice mail from Barbara Briscoe re: Warning of Intent to Cancel

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the response to the voice mail re: Ritter's Flea and Tick Spray at risk for cancellation due to data gaps for the 1-year storage stability and corrosion characteristic data requirements. In a letter dated June 9, 2008, I explained that Ritter Chemical first tried to satisfy these data requirements by using the "cite-all" method of data citation. It was not until we learned that the Agency would not accept the "cite-all" method of data citation that we looked and found a lab to run the 1-year storage stability/corrosion study.

On May 12, 2008, Ritter Chemical submitted a 28-day accelerated storage stability study to provide some information that the product is stable. This study was conducted using a controlled chamber with the temperature maintained at 50 C (122 F) and the product remained stable. This study was to provide information to the Agency while the complete 1-year storage stability study was being completed. This study will be completed in February 2009, and the study report should be submitted to EPA as soon as I receive the final report, which I expect to be no later than April 2009. Ritter Chemical is making good faith efforts in developing this data and respectfully requests that the Agency not initiate registration cancellation proceedings.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC

CANADA
275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754



"Heather Bjornson"
<HBjornson@TSGUSA.COM
>

12/10/2008 11:32 AM

To: Barbara Briscoe/DC/USEPA/US@EPA
cc: Linda Propst/DC/USEPA/US@EPA
bcc:
Subject: Voice Mail re: EPA REG No. 9468-31

Dear Barbara –
I have attached a formal response to your voice mail.

Regards,
Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th Street NW., Ste. 1000
Washington DC 20036
Tel.: 202-828-8945
Fax: 202-872-0745



Response to EPA 12-10-08.pdf



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

June 25, 2008

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

MGK 326 Data Call In: Response to EPA Letter dated June 9, 2008

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the response for the above referenced letter. The letter states the following:

- 1) *"You submitted a 28-day accelerated Storage Stability and Corrosion Characteristics study. In order to satisfy the MGK-326 product chemistry data requirement for Storage Stability and Corrosion Characteristics you must submit the one-year room temperature study."*
- 2) *"By the letter dated December 4, 2007, you were notified that the due date for submission of the Storage Stability and Corrosion Characteristics study was February 15, 2008."*

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

In response to item 1) above: The 28-day accelerated study was meant to give the Agency recent data on the storage stability of the product and is not a substitution for the 1 year study. A one-year storage stability study has been initiated with Custom Industrial Analysis Labs (CIA Labs) at the same time that the 28-day was initiated. Therefore, we expect to submit the final 1 year storage stability study in May 2009.

In response to item number 2) above: In a letter dated December 4, 2007, I was notified that the due date for submitting the storage stability data was February 15, 2008. Since Ritter Chemical did not have this data generated, it is impossible to submit a 1-year storage stability study in a 3-month period.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC

E-mail tsg@tsgusa.com

<http://www.tsgusa.com>

received
6/30/08

PK 16

7008 0150 0002 6192 5314
4125 2619 2000 0510 9002

U.S. Postal Service TM	
CERTIFIED MAIL TM RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To: <i>Technological Group, Inc.</i>	
Street, Apt. No., or PO Box No. <i>1150 18th St., N.W.</i>	
City, State, Zip+4 <i>W.D.C. 20036</i>	
PS Form 3800, August 2005 See Reverse for Instructions	

*MBK-526 (RED),
Post. chn. Time
Est. Receipt
#9468-31*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 21 2008

CERTIFIED MAIL

Ms. Heather R. Bjornson, Regulatory Agent
for Ritter Chemical LLC
Technology Sciences Group, Inc.
1150 18th Street, N.W. S. 1000
Washington, D.C. 20036

SUBJECT: MGK-326 Reregistration Eligibility Decision (RED)
Product Chemistry Time Extension Request
EPA Registration Numbers 9468-31

Dear Ms. Bjornson:

This letter is in regard to your product chemistry submission in response to the MGK-326 (RED) Product Specific Data Call-In Notice. In your letter dated June 27, 2008 you requested a time extension until May 2009 to submit the one year Storage Stability and Corrosion Characteristics studies. You stated that the Agency's letter on December 4, 2007 which established a due date of February 18, 2008 does not allow sufficient time to conduct a one year study. However, you were notified by the MGK-326 Product Specific Data Call-In Notice of April 27, 2005, and in letters dated June 15, 2006, September 8, 2006, and June 9, 2008 of the product chemistry deficiencies and allowed sufficient time to conduct an acceptable one year study.

The Agency will not grant additional time to submit this study. The Storage Stability and Corrosion Characteristics studies are overdue and you are subject to receiving a Notice of Intent to Suspend your MGK-326 product. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division

Concurrence								
Symbol	7508P	7508P						
Surname	Briscoe	Propst						
Date	7-11-08	7/21/08						18

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Sent To
Technometrics Sciences Group, Inc.

Street, Apt. No.,
or PO Box No.
1150 18th St. NW - Attn: 1006

City, State, ZIP+4
WDC 20036

PS Form 3800, June 2002

See Reverse for Instructions

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 19 2008

CERTIFIED MAIL

Heather R. Bjornson, Regulatory Agency
Technology Sciences Group, Inc.
1150 18th Street, N.W. S. 1000
Washington, D.C. 20036

SUBJECT: MGK 326, Reregistration Eligibility Decision (RED) Review of Product Chemistry Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter is in regard to your resubmission of product chemistry data in response to the MGK 326 (RED) Product Specific Data Call-In Notice. You submitted MRID Number 47421401. The Agency has made the following determinations:

- The data you submitted satisfy Enforcement Analytical Methods for Guideline requirement 830.1800.
- You submitted a 28-day accelerated Storage Stability and Corrosion Characteristics study. In order to satisfy the MGK-326 product chemistry data requirement for Storage Stability and Corrosion Characteristics you must submit the one-year room-temperature study.

By letter dated December 4, 2007, you were notified that the due date for submission of the Storage Stability and Corrosion Characteristics study was February 15, 2008. This study is overdue and therefore, you are subject to receive a Notice of Intent to Suspend your product. A copy of the Agency's Data Evaluation Record is enclosed. You have the option to request a voluntary cancellation. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division

Enclosure

Concurrence

Symbol	7508P	7508P						
Surname	Briscoe	Propst						
Date	6-9-08	6/9/08						20

7003 0500 0000 3113 8374

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ <i>NEK-326 (RED)</i>
Certified Fee	<i>rev. of certificate</i>
Return Receipt Fee (Endorsement Required)	<i>Postmark</i> <i>for. cert. #</i>
Restricted Delivery Fee (Endorsement Required)	<i>9468-31</i>
Total Postage & Fees	\$
Sent to <i>sciences</i> <i>Technological Group, Inc</i>	
Street, Apt. No., or PO Box No. <i>1150 18th St. SE</i>	
City, State, ZIP+4® <i>Alaska, AK 99506</i>	
PS Form 3800, June 2002 See Reverse for Instructions	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 21 2008

CERTIFIED MAIL

Ms. Heather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Sciences Group, Inc.
1150 18th Street, N.W. Suite 1000
Washington, D.C. 20036

SUBJECT: MGK-326, Reregistration Eligibility Decision (RED) Review of Acute Toxicity Data,
EPA Registration Number 9468-31

Dear Ms Bjornson:

This letter is in response to your request to waive acute toxicity data required in response to the Agency's MGK 326, RED Product Specific Data Call in Notice. Based on the information contained in your waiver request (MRID number 47347202) and information contained in the open literature, the Agency will grant the waiver requests. The product will be assigned the Toxicity Categories indicated below. The acute toxicity profile for EPA Registration Number 9468-31 is currently:

Guideline	Toxicity Category	Classification
Acute Oral	III	Waived
Acute Dermal	III	Waived
Acute Inhalation	IV	Waived
Primary Eye	III	Waived
Primary Dermal	IV	Waived
Skin Sensitization	non-sensitizer	Waived

If you do not agree with the toxicity categories, new studies must be conducted with the subject product and you must notify the Agency within ten days from your receipt of this letter that you will conduct new studies. A detailed data evaluation record is enclosed. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and
Reregistration Division

Enclosure

CONCURRENCES							
SYMBOL	7508P	7508P					
USERNAME	Briscoe	Propst					
DATE	5/16/08	5/21/08					



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>1/9/2008</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 regarding remaining data requirements that need to be satisfied for the re-registration of this product as part of the MGK -326 DCI.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson		5. Date February 14, 2008	



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Janeese Hackly
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

January 29, 2008

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

**Resubmission of data volume responding to the EPA Letter
dated January 9, 2008**

Dear Ms.Hackly:

Enclosed is the resubmission of the Analytical Methods for Ritter's Flea & Tick Spray data volume. The data volume has been revised to include CBI and the confidential attachment. This is in response to your fax dated January 29, 2008 detailing 86-5 deficiencies.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

January 22, 2008

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Response to EPA Letter dated January 9, 2008

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting this response to the EPA Letter referenced above. We will be submitting waiver requests in lieu of conducting studies to satisfy the acute toxicity data requirements. The waivers will be submitted with the storage and stability study before the deadline of February 15, 2008.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjomson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC

RECEIVED
JAN 23 2008
U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDE PROGRAMS
WASHINGTON, D.C. 20460

received
1/23/08
PRB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 20, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

RITTER CHEMICAL, LLC
1150 18TH ST., N.W., SUITE 1000
WASHINGTON, DC 20036-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 14-FEB-2008. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

**WASHINGTON**

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
 Barbara Briscoe
 Office of Pesticide Programs (7504P)
 U.S. Environmental Protection Agency
 Room S-4900, One Potomac Yard
 2777 South Crystal Drive
 Arlington, VA 22202-4501

February 14, 2008

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)**Response to EPA Letter dated January 9, 2008****SACRAMENTO**

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting this response to the EPA Letter referenced above. You will find the following enclosed:

- 1) EPA Application form,
- 2) Data Matrices (confidential and non-confidential versions),
- 3) Transmittal Document (Volume 1),
- 4) Storage stability data volume (Volume 2), and
- 5) Acute toxicity data requirement waiver volume (Volume 3).

Please note: the storage stability study is an accelerated study over a 14 day period. The study is still ongoing and the complete study report will be submitted upon completion.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
 Regulatory Agent for Ritter Chemical LLC

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

VOLUME 1 OF 3 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Ritter Chemical LLC
P.O Box 430974
Houston, TX 77243

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Reregistration Eligibility Decision

Submission of Storage Stability Study and Acute Toxicity Data Waivers

TRANSMITTAL DATE:

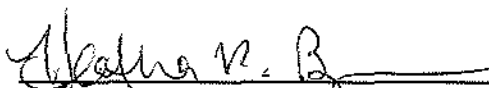
February 14, 2008

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 3	(Transmittal Document)	-----
47347201	2 of 3	Storage Stability for <i>Ritter's Flea & Tick Spray</i> (Preliminary Report)	830.6317
47347202	3 of 3	Response to Tier 1 Biochemical Data Requirements for <i>Ritter's Flea & Tick Spray</i> in Response to the MGK 326 Data Call In	870.1100 – 870.2600

COMPANY NAME: Ritter Chemical LLC

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 8, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

TECHNOLOGY SCIENCES GROUP, INC
RITTER CHEMICAL, LLC
1150 18TH ST., N.W., SUITE 1000
WASHINGTON, DC 20036-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 30-JAN-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Fax 202 872-0745

January 4, 2008

Submission of enforcement analytical methods

Fax 530 757-1299

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision to satisfy the enforcement analytical method data requirements.

- 1) EPA Re-registration Application Form,
- 2) Data Matrices (confidential and non-confidential versions – revised, dated January 4, 2008),
- 3) Transmittal Document, and
- 4) Three copies of the Enforcement Analytical Methods data volume.

Fax 613 236-3754

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsqusa.com.

Sincerely,

Elaine R. Boy

Heather R. Bjornson
Regulatory Agent for Ritter Chemical

<http://www.tsgusa.com>

VOLUME 1 OF 2 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Ritter Chemical LLC
P.O Box 430974
Houston, TX 77243

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Reregistration Eligibility Decision

Submission of Enforcement Analytical Methods

TRANSMITTAL DATE:

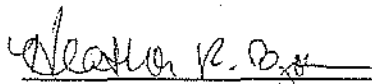
January 4, 2008

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 2	(Transmittal Document)	-----
47336501	2 of 2	Analytical Methods for <i>Ritter's Flea & Tick Spray</i>	830.1800

COMPANY NAME: Ritter Chemical LLC

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 8, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

TECHNOLOGY SCIENCES GROUP, INC
RITTER CHEMICAL, LLC
1150 18TH ST., N.W., SUITE 1000
WASHINGTON, DC 20036-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 04-JAN-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

We are unable to accept your data submittal for further processing and review, because of the significant deficiencies noted below. It is being returned to you for correction. If deficiencies were found which apply to your overall submission, they are described immediately following this paragraph. If problems are found with individual studies, they are described below linked to the study identifier found on the enclosed copy of your bibliography.

Rejected Study [01]:

* Your Statement of No Data Confidentiality Claims is contradicted by the marking(s) on page(s) 5-7, 9-12, 14-16, 18-21 of the study. If you do not intend to make Supplemental Claims of Data Confidentiality you can explicitly override these markings when you resubmit this study.



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Janeese Hackly
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

January 29, 2008

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

**Resubmission of data volume responding to the EPA Letter
dated January 9, 2008**

Dear Ms.Hackly:

Enclosed is the resubmission of the Analytical Methods for Ritter's Flea & Tick Spray data volume. The data volume has been revised to include CBI and the confidential attachment. This is in response to your fax dated January 29, 2008 detailing 86-5 deficiencies.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The Public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPP Information Management Division (2-37) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

Date February 14, 2008

EPA Reg. No./File Symbol
9468-31Page
1 of 2

Applicant's/Registrant Name and Address

Ritter Chemical

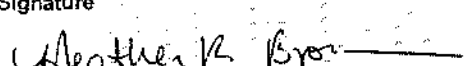
P.O. Box 430974

Houston, TX 77243

Product

Ritter's Flea & Tick Spray

Active Ingredient Pyrethrins, OI-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	47336501	Ritter Chemical LLC	OWN	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	47336501	Ritter Chemical LLC	OWN	
OPPTS 830.1800	Enforcement Analytical Method (PBO)	47336501	Ritter Chemical LLC	OWN	
OPPTS 830.1800	Enforcement Analytical Method (Pyrethrins)	47336501	Ritter Chemical LLC	OWN	
OPPTS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date February 14, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date February 14, 2008	EPA Reg. No./File Symbol 9468-31	Page 2 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Active Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6317	Storage Stability	This submission	Ritter Chemical LLC	OWN	
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	47221201	Farnam Companies	PAY	
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	This Submission	Ritter Chemical LLC	OWN	
OPPTS 870.1200	Acute Dermal Toxicity	This Submission	Ritter Chemical LLC	OWN	
OPPTS 870.1300	Acute Inhalation Toxicity	This Submission	Ritter Chemical LLC	OWN	
OPPTS 870.2400	Primary Eye Irritation	This Submission	Ritter Chemical LLC	OWN	
OPPTS 870.2500	Primary Skin Irritation	This Submission	Ritter Chemical LLC	OWN	
OPPTS 870.2600	Skin Sensitization	This Submission	Ritter Chemical LLC	OWN	
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			

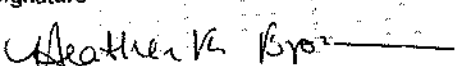
Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date February 14, 2008
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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Date February 14, 2008	EPA Reg. No./File Symbol 9468-31	Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Active Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission

Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date February 14, 2008
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The Public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPP Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date February 14, 2008	EPA Reg. No./File Symbol 9468-31	Page 2 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
redient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Famam Companies	PAY	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	

Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date February 14, 2008
---	---	---------------------------



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 regarding the re-registration of this end-use product as part of the MGK-326 DCI.

Section - III

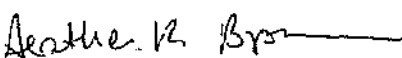
1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent		Telephone No. (Include Area Code) (202) 828-8943	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC			
4. Typed Name Heather R. Bjornson		5. Date May 12, 2008			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The Public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPP Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

May 12, 2008			EPA Reg. No./File Symbol 9468-3f	Page 1 of 2	
Registrant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243 Active Ingredient: Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide			Product Ritter's Flea & Tick Spray		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
TS 830.1550	Product Identity and Composition	4687340f	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.1600	Description of Materials Used to Manufacture Product	4687340f	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.1800	Enforcement Analytical Method (MGK 264)	47336501	Ritter Chemical LLC	OWN	
TS 830.1800	Enforcement Analytical Method (MGK 326)	47336501	Ritter Chemical LLC	OWN	
TS 830.1800	Enforcement Analytical Method (PBO)	47336501	Ritter Chemical LLC	OWN	
TS 830.1800	Enforcement Analytical Method (Pyrethrins)	4733650f	Ritter Chemical LLC	OWN	
TS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
TS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date May 12, 2008

Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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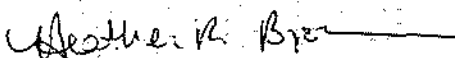
DATA MATRIX

Date May 12, 2008			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6317	Storage Stability	47347201 This submission	Ritter Chemical LLC	OWN	
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	47221201	Farnam Companies	PAY	
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	47347202	Ritter Chemical LLC	OWN	Waiver request
OPPTS 870.1200	Acute Dermal Toxicity	47347202	Ritter Chemical LLC	OWN	Waiver request
OPPTS 870.1300	Acute Inhalation Toxicity	47347202	Ritter Chemical LLC	OWN	Waiver request
OPPTS 870.2400	Primary Eye Irritation	47347202	Ritter Chemical LLC	OWN	Waiver request
OPPTS 870.2500	Primary Skin Irritation	47347202	Ritter Chemical LLC	OWN	Waiver request
OPPTS 870.2600	Skin Sensitization	47347202	Ritter Chemical LLC	OWN	Waiver request
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature <i>Heather R. Bjornson</i>			Name and Title Heather R. Bjornson, Regulatory Agent		Date May 12, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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Date May 12, 2008	EPA Reg. No./File Symbol 9468-31	Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date May 12, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date May 12, 2008			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Farnam Companies	PAY	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submis.
			Ritter Chemical LLC	OWN	Waiver request
			Ritter Chemical LLC	OWN	Waiver request
			Ritter Chemical LLC	OWN	Waiver request
			Ritter Chemical LLC	OWN	Waiver request
			Ritter Chemical LLC	OWN	Waiver request
Signature <i>Heather R. Bjornson</i>			Name and Title Heather R. Bjornson, Regulatory Agent		Date May 12, 2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 14, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

TECHNOLOGY SCIENCES GROUP, INC
RITTER CHEMICAL, LLC
1150 18TH ST., N.W., SUITE 1000
WASHINGTON, DC 20036-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 12-MAY-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

**WASHINGTON**

1150 18th Street, N.W.
 Suite 1000
 Washington, D.C. 20036
 Telephone 202 223-4392
 Fax 202 872-0745

Linda Propst
 Barbara Briscoe
 Office of Pesticide Programs (7504P)
 U.S. Environmental Protection Agency
 Room S-4900, One Potomac Yard
 2777 South Crystal Drive
 Arlington, VA 22202-4501

May 12, 2008

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Submission of final report for the accelerated storage stability study

SACRAMENTO

712 Fifth Street
 Suite A
 Davis, CA 95616
 Telephone 530 757-1298
 Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed final report for the 28-Day accelerated storage stability study for the above referenced product. You will find the following:

- 1) EPA Application form,
- 2) Data Matrices (confidential and non-confidential versions),
- 3) Transmittal Document (Volume 1), and
- 4) Final report: Storage stability data volume (Volume 2).

CANADA

275 Slater Street
 Suite 900
 Ottawa, Ontario
 K1P 5H9
 Telephone 613 247-6285
 Fax 613 236-3754

With this submission, we believe that Ritter Chemical LLC has satisfied all data requirements for the MGK data call in.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
 Regulatory Agent for Ritter Chemical LLC

VOLUME 1 OF 2 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Ritter Chemical LLC
P.O Box 430974
Houston, TX 77243

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Reregistration Eligibility Decision

Submission of Storage Stability Study -28-Day - Final Report

TRANSMITTAL DATE:

May 12, 2008

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 2	(Transmittal Document)	-----
47421401	2 of 2	Storage Stability for <i>Ritter's Flea & Tick Spray</i> (28-Day - Final Report)	830.6317

COMPANY NAME: Ritter Chemical LLC

COMPANY OFFICIAL:



Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945

**WASHINGTON**

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
 Barbara Briscoe
 Office of Pesticide Programs (7504P)
 U.S. Environmental Protection Agency
 Room S-4900, One Potomac Yard
 2777 South Crystal Drive
 Arlington, VA 22202-4501

February 14, 2008

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)**Response to EPA Letter dated January 9, 2008****SACRAMENTO**

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting this response to the EPA Letter referenced above. You will find the following enclosed:

- 1) EPA Application form,
- 2) Data Matrices (confidential and non-confidential versions),
- 3) Transmittal Document (Volume 1),
- 4) Storage stability data volume (Volume 2), and
- 5) Acute toxicity data requirement waiver volume (Volume 3).

Please note: the storage stability study is an accelerated study over a 14 day period. The study is still ongoing and the complete study report will be submitted upon completion.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
 Regulatory Agent for Ritter Chemical LLC

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

VOLUME 1 OF 3 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Ritter Chemical LLC
P.O Box 430974
Houston, TX 77243

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Reregistration Eligibility Decision

Submission of Storage Stability Study and Acute Toxicity Data Waivers

TRANSMITTAL DATE:

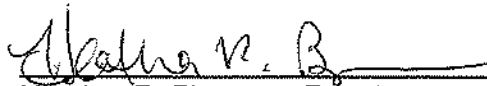
February 14, 2008

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 3	(Transmittal Document)	-----
47347201	2 of 3	Storage Stability for <i>Ritter's Flea & Tick Spray</i> (Preliminary Report)	830.6317
47347202	3 of 3	Response to Tier 1 Biochemical Data Requirements for <i>Ritter's Flea & Tick Spray</i> in Response to the MGK 326 Data Call In	870.1100 – 870.2600

COMPANY NAME: Ritter Chemical LLC

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945

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MEK (RED), Review
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 data, # 0468-31

Sent To: Technology Services Group, Inc.
 Street, Apt. No.: 1150 18th Street N.W., Ste. 1000
 or PO Box No.:
 City, State: Wash., DC 20036

PS Form 3800, June 2002 See Reverse for Instructions

7006 0810 0000 0328 0104

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 19 2008

CERTIFIED MAIL

Hcather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Sciences Group, Inc.
1150 18th Street N.W. Suite 1000
Washington, D.C. 20036

SUBJECT: MGK Reregistration Eligibility Decision (RED) Review of Acute Toxicity Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter is in regard to your submission citing acute toxicity data in response to the MGK 326, (RED) Product Specific Data Call-In Notice. You cited acute toxicity studies conducted on EPA Registration No. 270-301 to support the reregistration of your product EPA Registration Number 9468-31. The MRIDs are as follows: 46812902 (81-1), 46812903 (81-2), 46812904 (81-3), 46812905 (81-4), 46812906 (81-5), and 46812907 (81-6). After reviewing the Confidential Statements of Formula from your product EPA Registration number 9468-31 and EPA Registration Number 270-301, the Agency will not allow the subject product to cite the data.

The Acute toxicity profile for EPA Registration No. 9468-31 is currently:

81-1,	Acute Oral	Data Needed
81-2	Acute Dermal	Data Needed
81-3,	Acute Inhalation	Data Needed
81-4,	Primary Eye	Data Needed
81-5,	Primary Dermal	Data Needed
81-6,	Skin Sensitization	Data Needed

Within 10 days from your receipt of this letter you must cite acceptable studies or inform the Agency that you intend to conduct new studies to support the acute toxicity data requirements for EPA Registration number 9468-31. If you choose to conduct new studies, the data will be due 90 days from receipt of this letter. Your failure to submit this data within these time frames will result in your receiving a Notice of Intent to Suspend your product. You have the option to voluntarily cancel this product. A copy of the Agency's Data Evaluation Record is enclosed. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division

Enclosure

CONCURRENCES

7508P	1508P							
Briscoe	Propst							
1/8/08	1/9/08							

EPA FORM 1320-1A (1/90)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 7, 2008

MEMORANDUM:

Subject: EPA Reg. No.: 9468-31/Ritter's Flea & Tick Spray
DP Barcode: 344126
Case No.: 0002

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Marianne Lewis 1/7/08

To: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Ritter Chemical LLC
P.O. Box 430974
Houston, TX 77243

FORMULATION FROM EPA Reg. No. 9468-31 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
MGK 326	0.50%
MGK 264	0.50%
PBO	1.50%
Pyrethrin	0.15%
<u>Inert Ingredient(s):</u>	<u>97.35%</u>
Total	100.00%

BACKGROUND: In the 8 month response to the MGK 326 RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 9468-31. The MRID's are as follows: 468129-02 (81-1), 468129-03 (81-2), 468129-04 (81-3), 468129-05 (81-4), 468129-06 (81-5), 468129-07 (81-6). The studies were conducted by Product Safety Labs and the test material used in each of the studies was EPA Reg. No. 270-301.

After reviewing the CSF's from the subject product and EPA Reg. No. 270-301 the Agency will not allow the subject product to cite the data listed above. New studies conducted on the subject product should be cited or submitted for review.

RECOMMENDATIONS:

- The request to cite the studies listed above is denied. New studies conducted on the subject product should be cited or submitted for review.

The acute toxicity profile for EPA Reg. No. 9468-31 is currently:

Acute Oral	Data Needed
Acute Dermal	Data Needed
Acute Inhalation	Data Needed
Primary Eye	Data Needed
Primary Dermal	Data Needed
Skin Sensitization	Data Needed

NOTE: The labeling will be completed upon receipt of the required information.

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McK-326 (RED),
 Reviewer's Print Name
 dtd; #944831
 Head

Sent To
 Technology Services Group Inc
 Street Apt. No.
 or PO Box No. 1159 18th Street, N.W. Ste. 1200
 City State Zip
 Washington, DC 20036

PS Form 3800, August 2005 See Reverse for Instructions

7002 0120 0000 2748 6426

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 4 2007

CERTIFIED MAIL

Heather R. Bjornson, Regulatory Agency
Technology Sciences Group, Inc.
1150 18th Street, N.W. S. 1000
Washington, D.C. 20036

SUBJECT: MGK 326, Reregistration Eligibility Decision (RED) Review of Product Chemistry Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter is in regard to your resubmission of product chemistry data in response to the MGK 326 (RED) Product Specific Data Call-In Notice. Specifically, this responds to your letters dated September 20 and November 19, 2007 which cited data from other sources to fulfill the product chemistry data requirements for your product EPA Registration Number 9468-31. The Agency has made the following determinations:

- You cited Enforcement Analytical data from MGK Technical, (MRIDs 46850801, 41605102, 42321101, 43015101, 43033201) and MGK 264 (MRIDs 43033201, 40306301 and 00161127). Your product contains four active ingredients – Pyrethrins, Piperonyl Butoxide, (PBO), N-Octyl bicycloheptene dicarboximide (MGK 264) and MGK 326 (Di-n-propyl isocinchomeronate). The methods may support the MGK 326 and MGK 264 active ingredients but not Pyrethrins and PBO. Therefore, the Enforcement Analytical Method requirement is still incomplete. Acceptable analytical methods for Pyrethrins and PBO or a method capable of quantifying all four active ingredients must be submitted to achieve compliance with the Notice.
- You cited Storage Stability and Corrosion Characteristics data from Farnam Companies. A review of the Confidential Statements of Formula and labels for EPA Registration numbers 9468-31 and 270-301 indicate that the citation is not acceptable. The two products are not the same in terms of active and inert ingredient contents. The two products are not substantially similar, therefore, Reg No. 9468-31 may not cite the Storage Stability and Corrosion Characteristics data from Reg. No. 270-301. Guidelines 830-6317 and 830-6320 are still outstanding.
- In the letter of November 19, 2007 you indicated that you will conduct a one year Storage Stability study and requested that you be allowed to submit a three month interim study within the 90 day time frame specified in the Agency's letter to you dated October 23, 2007. You indicate that additional time will be needed to complete the study. Your request is denied. The due date for submission of the final study is February 15, 2008.

You are required to cite or submit new acceptable Enforcement Analytical Method data within 30 days from your receipt of this letter. The Storage Stability and Corrosion Characteristics study is due February 15, 2008. Failure to submit this data within this time frame may result in your receiving a Notice of Intent to Suspend your product. A copy of the Agency's Data Evaluation Record is enclosed. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief

Product Reregistration Branch
Special Review and Reregistration Division

Symbol	PRB	7508P					
Surname	Briscoe	Propst					
Date	11-29-07	12/4/07					53

DATE OUT: 15/NOV/07

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 346202

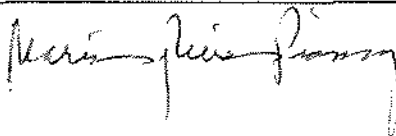
REG./FILE SYMBOL NO.: 9468-31

PRODUCT NAME: Ritter's Flea and Tick Spray

COMPANY NAME: Ritter Chemical LLC

ACTION CODE: 675

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508C)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

With this re-submission, the registrant is responding to the product chemistry data deficiencies noted in our review of 10/16/07, by citing Enforcement Analytical Method from EPA Reg. No. 1021-461 and Storage Stability and Corrosion Characteristics data from EPA Reg. No. 270-301. The registrant is requesting FIFRA Section 4 reregistration of **Ritter's Flea and Tick Spray**, EPA Reg. No. 9468-31.

FINDINGS:

1. The referenced analytical methods are for the Technical MGK 326 (468508-01, 416051-02, 423211-01, 430151-01, and 434525-01) and MGK 264 (430332-01, 403063-01, and 00161127). The subject product has four active ingredients - Pyrethrins, Piperonyl Butoxide (PBO), N-Octyl bicycloheptene dicarboximide (MGK 264), and MGK 326 (Di-n-propyl isocinchomeronate). The methods may support the MGK 326 and MGK 264 active ingredients but not Pyrethrins and PBO. Therefore, the Enforcement Analytical Method requirement is still incomplete. The registrant needs to cite or reference analytical methods for Pyrethrins and PBO or submit a method that is capable of quantifying all four active ingredients. Guideline 830.1800 is still outstanding.
2. Review of the CSFs and labels (Reg. No. 9468-31 vs. Reg. No. 270-301) indicates that the citation for Storage Stability and Corrosion Characteristics is not acceptable. The two products are not the same in terms of active and inert ingredient contents. Reg. No. 9468-31 has four active ingredients [Pyrethrins, Piperonyl Butoxide (PBO), N-Octyl bicycloheptene dicarboximide (MGK 264), and MGK 326 (Di-n-propyl isocinchomeronate)] while Reg. No. 270-301 has five [Pyrethrins, Piperonyl Butoxide (PBO), N-Octyl bicycloheptene dicarboximide (MGK 264), MGK 326 (Di-n-propyl isocinchomeronate), and Permethrin]. From the product chemistry point of view, the two products are not substantially similar, therefore, Reg. No. 9468-31 may not cite the Storage Stability and Corrosion Characteristics data from Reg. No. 270-301. Guidelines 830.6317 and 830.6320 are still outstanding.

CONCLUSIONS:

After completing the Enforcement Analytical Method, Storage Stability, and Corrosion Characteristics requirements, the registrant will satisfy the MGK-326 product chemistry data requirements for the reregistration of EPA Reg. No. 9468-31.

**WASHINGTON**

1150 18th Street, N.W.

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Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

November 19, 2007

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)**Submission of revised data matrices****SACRAMENTO**

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision to satisfy the remaining enforcement analytical method data requirements.

In the Data Evaluation Review, there is the comment, "*Storage Stability and Corrosion Characteristics were also cited as data gaps in the previous review. These requirements were not addressed in this submission and are still outstanding*". The sole purpose of the submission dated September 20, 2007, was to cite a similar products' storage stability/corrosion characteristics study (Equicare Flysect; EPA Reg. Nos. 270-305, 301, and 350 – MRID No. 47221201). The cover letter included a table comparing the cited product formulation and Ritter's Flea & Tick Spray. Again this Table (A) is included below.

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

Table 1. Formulation Comparison between Ritter's Flea and Tick Spray and Equicare Flysect Repellent Face Lotion

	Amount in Ritter's Flea and Tick	Amount in EquiCare Flysect
MGK Repellent 326	0.50%	1.00%
MGK 264	0.50%	0.50%
Pyrethrins	0.15%	0.15%
Piperpnyl Butoxide	1.50%	1.00%
Total Active Ingredients	2.65%	2.65%

E-mail tsg@tsgusa.com<http://www.tsgusa.com>

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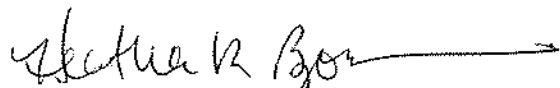
As a precautionary step, Ritter Chemical is contacting laboratories to perform a one-year storage stability and corrosion characteristics study. Since the storage stability study has to be conducted over 1-year, it is impossible to submit this study in the 90-Day time frame stipulated in the EPA letter dated October 23, 2007 and therefore, we are requesting an extension for submitting this study with the agreement that the 3-month data is submitted to the Agency.

You will find the following in support of this product:

- 1) EPA Re-registration Application Form,
- 2) Certification with Respect to Data Citation (revised), and
- 3) Data Matrices (confidential and non-confidential versions – revised, dated Nov.19, 2007).

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,



Heather R. Bjornson
Regulatory Agent for Ritter Chemical



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel: 713-461-2262	EPA Registration Number/File Symbol 9468-31
Active Ingredient(s) and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid	Date November 19, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Heather R. Bjornson</i>	Date 11/19/2007	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agent
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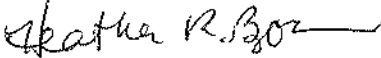
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Date November 19, 2007	EPA Reg. No./File Symbol 9468-31	Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	

Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	00161127 40306301 43033201 ✓	McLaughlin Gormley King Corp. (MGK)	PER	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	41605102 42321101 42757901 43015101 ✓ 43452501 ✓ 46850801 ✓	McLaughlin Gormley King Corp. (MGK)	PER	
OPPTS 830.1800	Enforcement Analytical Method (PBO)	45731003 47250601	MGK	PAY PER	
OPPTS 830.1800	Enforcement Analytical Method (Pyrethrins)	47026601 47188501 47250601	Wellmark International Sivad Manufacturing MGK	PAY PAY PER	
OPPTS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission

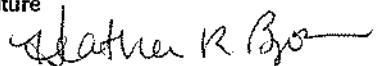
Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date November 19, 2007
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✓ IR 10-31-07
 • Reviewed 6/7/07 1800 is data gap

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DATA MATRIX

Date November 19, 2007			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6317	Storage Stability	47221201	Farnam Companies	PAY	
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	47221201 ✓	Farnam Companies	PAY	
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	46812902	Farnam Companies, Inc.	PAY	
OPPTS 870.1200	Acute Dermal Toxicity	46812903	Farnam Companies, Inc.	PAY	
OPPTS 870.1300	Acute Inhalation Toxicity	46812904	Farnam Companies, Inc.	PAY	
OPPTS 870.2400	Primary Eye Irritation	46812905	Farnam Companies, Inc.	PAY	
OPPTS 870.2500	Primary Skin Irritation	46812906	Farnam Companies, Inc.	PAY	
OPPTS 870.2600	Skin Sensitization	46812907	Farnam Companies, Inc.	PAY	
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date November 19, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Date November 19, 2007	EPA Reg. No./File Symbol 9468-31	Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
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			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			McLaughlin Gormley King Corp. (MGK)	PER	
			McLaughlin Gormley King Corp. (MGK)	PER	
			MGK	PAY PER	
			Wellmark International Sivad Manufacturing MGK	PAY PAY PER	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission

Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date November 19, 2007
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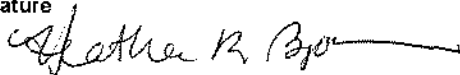
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DATA MATRIX

Date November 19, 2007	EPA Reg. No./File Symbol 9468-3f	Page 2 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Farnam Companies	PAY	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Farnam Companies	PAY	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	

Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date November 19, 2007
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**WASHINGTON**

1150 18th Street, N.W.

Suite 1000

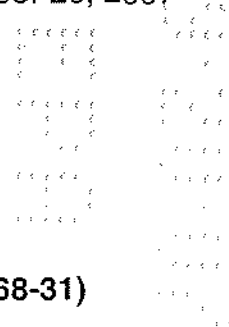
Washington, D.C. 20036

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Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

September 20, 2007

**RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)****Submission of revised data matrices****SACRAMENTO**

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision to satisfy the remaining corrosion and storage stability data requirements. The enclosed data matrix cites the data submitted to support Equicare Flysect Repellent Face Lotion (EPA Reg. No. 270-305, 301, and 350). The active ingredients in the Equicare Flysect product formulation is similar to Ritter's Flea and Tick Spray, see Table 1 for a formulation comparison.

Table 1. Formulation Comparison between Ritter's Flea and Tick Spray and Equicare Flysect Repellent Face Lotion

	Amount in Ritter's Flea and Tick	Amount in EquiCare Flysect
MGK Repellent 326	0.50%	1.00%
MGK 264	0.50%	0.50%
Pyrethrins	0.15%	0.15%
Piperpnyl Butoxide	1.50%	1.00%
Total	2.65%	2.65%

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

A handwritten signature and a date stamp reading "9/20/07" are located in the bottom right corner of the page.

**WASHINGTON**

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

September 20, 2007

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Submission of revised data matrices

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision to satisfy the remaining corrosion and storage stability data requirements. The enclosed data matrix cites the data submitted to support Equicare Flysect Repellent Face Lotion (EPA Reg. No. 270-305, 301, and 350). The active ingredients in the Equicare Flysect product formulation is similar to Ritter's Flea and Tick Spray, see Table 1 for a formulation comparison.

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CANADA

275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 235-3754

Handwritten signature and date: 9/20/07

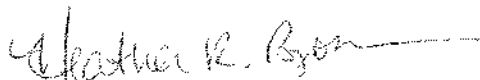
We believe that this submission satisfies the product specific re-registration data requirements as discussed in the EPA letter referenced above.

You will find the following in support of this product:

- 1) EPA Re-registration Application Form,
- 2) Certification with Respect to Data Citation (revised), and
- 3) Data Matrices (confidential and non-confidential versions - revised).

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "Heather R. Bjornson", followed by a horizontal line.


Heather R. Bjornson
Regulatory Agent for Ritter Chemical

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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Date September 20, 2007	EPA Reg. No./File Symbol 9468-31	Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		


Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	00161127 40306301 43033201	McLaughlin Gormley King Corp.	PER	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	41605102 42321101 42757901 43015101 43452501 46850801	McLaughlin Gormley King Corp.	PER	
OPPTS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explodability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission

Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date September 20, 2007
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date September 20, 2007			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6317	Storage Stability	47221201	Farnam Companies	PAY	
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	47221201	Farnam Companies	PAY	
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	46812902	Farnam Companies, Inc.	PAY	
OPPTS 870.1200	Acute Dermal Toxicity	46812903	Farnam Companies, Inc.	PAY	
OPPTS 870.1300	Acute Inhalation Toxicity	46812904	Farnam Companies, Inc.	PAY	
OPPTS 870.2400	Primary Eye Irritation	46812905	Farnam Companies, Inc.	PAY	
OPPTS 870.2500	Primary Skin Irritation	46812906	Farnam Companies, Inc.	PAY	
OPPTS 870.2600	Skin Sensitization	46812907	Farnam Companies, Inc.	PAY	
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date September 20, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Date September 20, 2007	EPA Reg. No./File Symbol 9468-31	Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			McLaughlin Gormley King Corp.	PER	
			McLaughlin Gormley King Corp.	PER	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission

Signature



Name and Title

Heather R. Bjornson, Regulatory Agent


Date

September 20, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date September 20, 2007			EPA Reg. No./File Symbol 9468-3t	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Farnam Companies	PAY	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Farnam Companies	PAY	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
Signature 			Name and Title Heather R. Blomson, Regulatory Agent		Date September 20, 2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel:713-461-2262	EPA Registration Number/File Symbol 9468-31
Active Ingredient(s) and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid	Date September 20, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 09/20/2007	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agent
---------------	--------------------	--



United States
Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 and a telephone conversation with Barb Briscoe regarding remaining data requirements that need to be satisfied for the re-registration of this product as part of the MGK -326 DCI.

Section - III

1. Material This Product Will Be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC			
4. Typed Name Heather R. Bjornson		5. Date September 20, 2007			

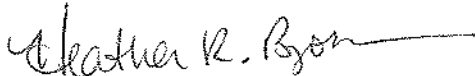
We believe that this submission satisfies the product specific re-registration data requirements as discussed in the EPA letter referenced above.

You will find the following in support of this product:

- 1) EPA Re-registration Application Form,
- 2) Certification with Respect to Data Citation (revised), and
- 3) Data Matrices (confidential and non-confidential versions - revised).

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,



Heather R. Bjornson
Regulatory Agent for Ritter Chemical

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Street, Apt. No., or PO Box No.: 150 1st Street N.W.

City, State, ZIP+4[®]: Wash, DC 20036

PS Form 3800, August 2002 See Reverse for Instructions

7007 0720 0001 7418 9855

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 23 2007

CERTIFIED MAIL

Ms. Heather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Sciences Group, Inc
1150 18th Street N.W.
Suite 1000
Washington, D. C. 20036

SUBJECT: MGK 326, Reregistration Eligibility Decision (RED) Review of Product Chemistry Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter is in regard to your submission of product chemistry data in response to the MGK-326 (RED) Product Specific Data Call-In Notice. You cited Enforcement Analytical Method data from EPA Registration Number 1021-461 to support the reregistration of your product, EPA Registration Number 9468-31. The Agency has made the following determinations:

The analytical method being cited is applicable only to MGK-326 (GLC Method of Analysis for Technical MGK® Repellent 326). The subject product has four active ingredients – Pyrethrins, Piperonyl Butoxide (PBO), N-Octyl bicycloheptene dicarboximide (MGK 264) and MGK 326 (Di-n-propyl isocinchomeronate). The method may support the MGK 326 active ingredient but not Pyrethrins, PBO, and MGK 264. Therefore, the Enforcement Analytical Method is incomplete. You are required to cite or submit new data on these ingredients.

Within thirty days from your receipt of this letter you are required to cite acceptable Enforcement Analytical Method data or inform the Agency that you will conduct new data. If you conduct new studies the data will be due to the Agency within 90 days from your receipt of this letter. Your failure to submit this data within these time frames may result in your receiving a Notice of Intent to Suspend your product. A copy of the Agency's Data Evaluation Record is enclosed. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division

Enclosure

CONCURRENCES

SYMBOL	PRB	7508P					
SIGNATURE	Propst	Propst					
DATE	10-16-07	10/23/07					

OFFICIAL FILE COPY

DATE OUT: 16/OCT/07

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 344132

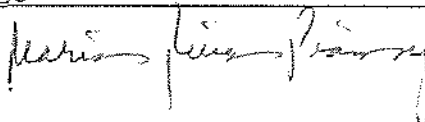
REG./FILE SYMBOL NO.: 9468-31

PRODUCT NAME: Ritter's Flea and Tick Spray

COMPANY NAME: Ritter Chemical LLC

ACTION CODE: 675

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508C)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

With this re-submission, the registrant is responding to the product chemistry data deficiencies noted in our review of 8/29/06, by citing Enforcement Analytical Method from EPA Reg. No. 1021-461. The registrant is requesting FIFRA Section 4 reregistration of **Ritter's Flea and Tick Spray**, EPA Reg. No. **9468-31**.

FINDINGS:

1. The analytical method being cited is applicable only to MGK 326 ("GLC Method of Analysis for Technical MGK® Repellent 326", reviewed and accepted by PRB on 6/7/07 for Reg. No. 1021-461). The subject product has four active ingredients - Pyrethrins, Piperonyl Butoxide (PBO), N-Octyl bicycloheptene dicarboximide (MGK 264), and MGK 326 (Di-n-propyl isocinchomeronate). The method may support the MGK 326 active ingredient but not Pyrethrins, PBO, and MGK 264. Therefore, the Enforcement Analytical Method is incomplete. The registrant needs to cite or reference analytical methods for Pyrethrins, PBO, and MGK 264. Guideline 830.1800 is still outstanding.
2. Storage Stability and Corrosion Characteristics were also cited as data gaps in the previous review. These requirements were not addressed in this submission and are still outstanding.

CONCLUSIONS:

After completing the Enforcement Analytical Method, Storage Stability, and Corrosion Characteristics requirements, the registrant will satisfy the MGK-326 product chemistry data requirements for the reregistration of EPA Reg. No. **9468-31**.

DATE OUT: 07/JUNE/07

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [X]; MUP [X]; EUP []

BARCODE NO.: 334933

REG./FILE SYMBOL NO.: 1021-461

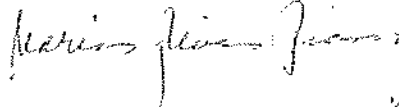
PRODUCT NAME: MGK® Repellent 326

MRID NOS: 430151-01, 416051-01, -02, -03, 427579-01, 423211-01, 466163-01, 415206-01, -02, 415483-01, 422304-01, 441902-01, 434525-01, 469716-01, 468508-01, 467168-01

COMPANY NAME: McLaughlin Gormley King Company

ACTION CODE: 674

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508C)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 2215, was issued in September 23, 2003 for the Technical Grade Active Ingredient (TGAI), MGK 326: Di-n-propyl isocinchomeronate (2,5-Pyridine carboxylic acid, dipropyl ester). The generic data base supporting the reregistration of MGK 326 for its current uses have been reviewed and found to be substantially complete.

In the 8-month response to the MGK 326 RED, the registrant submitted a basic formulation Confidential Statement of Formula (CSF), dated 12/21/05, a draft label EPA received 12/27/05, and product chemistry data in MRID numbers 430151-01, 416051-01, -02, -03, 427579-01, 423211-01, 466163-01, 415206-01, -02, 415483-01, 422304-01, 441902-01, 434525-01, 469716-01, 468508-01, and 467168-01. The registrant is requesting FIFRA Section 4 reregistration of **MGK® Repellent 326**, EPA Reg. No. 1021-461.

FINDINGS:

1. EPA Reg. No. 1021-461 is a technical/manufacturing-use product, produced through an integrated production process and is composed of 99.40% Di-n-propyl isocinchomeronate (MGK 326).
2. The CSF for the basic formulation dated 12/21/05 is acceptable as presented. The nominal concentration of the active ingredient agrees with that on the label, meeting PR Notice 91-2. The certified limits on the active inert ingredient and the upper limits on the impurities are acceptable in accordance with 40 CFR 158.175(b)(2).
3. The product chemistry data referenced in MRID numbers 430151-01, 416051-01, -02, -03, 427579-01, 423211-01, 415206-01, -02, 415483-01, 422304-01, 441902-01, 434525-01 were submitted during the Phase III and Phase IV product chemistry requirements for reregistration of MGK 326. The data were reviewed by HED under Barcode numbers D285966 (dated 11/25/02) and D209718 (dated 8/12/96). Data that were found acceptable are the following:

Guideline Reference Number	Requirement	MRID Number
830.1600	Description of Materials Used to Produce the Product	416051-01, 423211-01
830.1620	Description of Production Process	416051-01, 423211-01
830.1670	Discussion of Formation of Impurities	415051-01, 423211-01

Guideline Reference Number	Requirement	MRID Number
830.6302	Color	416051-03
830.6303	Physical state	416051-03
830.6304	Odor	416051-03
830.6313	Stability	434525-01, 441902-01
830.6315	Flammability/Flame Extension	416051-03
830.6316	Explosibility	416051-03
830.6317	Storage Stability	416051-03
830.6319	Miscibility	416051-03
830.6320	Corrosion Characteristics	416051-03
830.7000	pH	416051-03
830.7220	Boiling Point/Boiling Range	416051-03
830.7300	Density	416051-03
830.7370	Dissociation Constant in Water	422304-01, 423211-01
830.7550/7560/7570	Partition Coefficient	416051-03, 415206-02
830.7840/7860	Solubility	416051-03
830.7950	Vapor Pressure	415483-01

4. Data gaps in the previous HED reviews included Product Identity and Composition (GRN 830.1550), Preliminary Analysis (GRN 830.1700), Certified Limits (GRN 830.1750), Enforcement Analytical Method (GRN 830.1800), and UV/Visible Absorption (GRN 830.7050). These data are included in this submission and are found in MRID numbers 466163-01, 469716-01, 468508-01, and 467168-01. See pages 3 and 4 of this review for the data evaluation.
5. A new Storage Stability and Corrosion Characteristics study was also included in this submission (MRID number 469716-01). The study was initiated on 08/12/05 and ended on 10/23/06. The test material used was EPA Reg. No. 1021-461.
6. The Ingredients statements on the label are acceptable in accordance with 40 CFR 158.155. There are no data present that would trigger the Physical or Chemical Hazards statements on the label. The Storage and Disposal statements are acceptable in accordance with 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

The data submitted in MRID numbers 466163-01, 469716-01, 468508-01, 469716-01, and 467168-01 are acceptable and satisfy the product chemistry requirements of GRN's 830.1550, 830.1700, 830.1750, 830.1800, 830.6317, 830.6320, and 830.7050 pertaining to Product Identity and Composition, Preliminary Analysis, Certified Limits, Enforcement Analytical Method, Storage Stability, Corrosion Characteristics, and UV/Visible Absorption, respectively.

The product chemistry data referenced in MRID numbers 430151-01, 416051-01, -02, -03, 427579-01, 423211-01, 415206-01, -02, 415483-01, 422304-01, 441902-01, and 434525-01, previously reviewed and accepted by the Agency, still meet current Agency guidelines and may be used to satisfy guideline requirements

3

830-6302, -6303, -6304, -6313, -6315, -6316, -6317, -6319, -6320, -7000, -7220, -7300, -7370, -7550/7560/7570, -7840/7860, and -7950, pertaining to Color, Physical state, Odor, Stability, Flammability, Explodability, Storage Stability, Corrosion Characteristics, pH, Boiling Point, Density, Dissociation Constant in Water, Partition Coefficient, Solubility, and Vapor Pressure, respectively.

The registrant has satisfied product chemistry data requirements for the reregistration of EPA Reg. No. **1021-461**.

THIS REVIEW CONTAINS FIFRA CBI

REVIEW OF PRODUCT CHEMISTRY DATA:

PRODUCT NAME: MGK Repellent 326

EPA Reg. No: 1021-461

Group A: Series 830-Product Identity, Composition, and Analysis (40 CFR158.155, .160, .165, .167, .170, .175 & .180).

830-1550 Product Identity and Composition

EPA Reg. No. 1021-1813 is a technical grade/manufacturing-use product produced through an integrated system and contains the active ingredient MGK 326 (Di-n-propyl isocinchomeronate) at 99.40% purity with the impurities [REDACTED]

[REDACTED] The percentages recovered from analysis of 5 lots of the technical product ranged from 99.287 to 99.547.

830-1800 Enforcement of Analytical Method

The analytical method used in determining the active ingredients in this product is "GLC Method of Analysis for Technical MGK® Repellent 326" using a Hewlett-Packard gas chromatograph (or equivalent equipped with flame ionization detection). The GLC conditions are as follows:

Column – 5% OV-1 on chromosorb W(HP) 80/100 mesh, 120 cm x 4 mm id, glass

Temperatures: Column – 200°C

Inj. Port - 300°C

Detector - 300°C

Gas Flows: N₂ – 50 ml/min.

Air – 240 mL/min

H₂ - 60 mL/min

Detector Sensitivity: 5 x 10⁻¹¹ AFS

The dilution solvent was acetone (GLC grade) and the internal standard used was Dipentyl phthalate (DPP). The method is found to be adequate and will support reregistration of the subject product.

THIS REVIEW CONTAINS FIFRA CBI

Confidential Appendix A830-1700 Preliminary Analysis (MRID number 467168-01)

Results of preliminary analysis of 5 lots of the technical product are presented below (MRID number 467168-01):

Peak	Lot #CG047	Lot #CG048	Lot #CH049	Lot #CK050	Lot #CK051	Certified Limits
MGK 326	99.394%	99.547%	99.287%	99.396%	99.450%	94.1–100%

* [REDACTED] is no longer used in the manufacture of MGK Repellent 326

830-6317 and 830-6320 Storage Stability and Corrosion Characteristics (MRID number 469716-01)

The Storage Stability study was conducted in accordance with the GLP standards. The test material was stored in clear glass (for visual observation only), amber glass, and FL-HDPE containers at 100°F and room temperature. The 100°F samples were analyzed at 0, 3, 6, and 12 months and the room temperature samples at 0, 12, 18, 24, and 30 months of storage. At 12 months, the FL-HDPE containers at 100°F were observed for any signs of corrosion. At 36 months, the FL-HDPE containers at RT were observed for signs of corrosion as well.

Results:

% MGK 326 Declared: 97%

% MGK 326	Initial	3 months	6 months	12 months
Amber glass	99.75			
FL-HDPE	99.76			
Amber glass, 100°F		99.71	99.71	99.32
FL-HDPE, 100°F		99.71	99.71	99.45
Amber glass, RT				99.69
FL-HDPE, RT				99.80

No physical changes to the test material occurred at 3 and 6 months. The substance remained a clear, light yellow liquid. At the 12-month, all samples at 100°F were darker than the RT samples. All storage containers appeared in good condition throughout the study. No signs of corrosion were observed.

THIS REVIEW CONTAINS FIFRA CBI

830-7050 UV/Visible Absorption (MRID number 466163-01)

Test substance: MGK Repellent 326, Lot # EB062

Sample	Maxima (nm)	ϵ (L/mol-cm)	Bandwidth, nm
Neutral sample	271.5	5390	253.5 – 283.0
	229.0	13453	215.0 – 241.5
Acidic sample	272.0	5678	253.0 – 283.5
	229.0	13499	214.0 – 242.0
Basic sample	270.5	5588	251.0 – 283.0
	226.0	11792	213.0 – 240.0

M.R. Piansay and Central File (EPA Reg. No. 1021-461
 7508C:SRRD:PRB:CM-2: M.R.P.: (7/JUNE/07):703-308-8063:<1021-461>

THIS REVIEW CONTAINS FIFRA CBI



McLAUGHLIN GORMLEY KING COMPANY

8810 Tenth Avenue North • Minneapolis, MN 55427-4319 U.S.A.
763-544-0341 • 800-645-6466 • Fax 763-544-6437 • www.mgk.com

October 6, 2006

Mr. Richard Gebken, PM10
Office of Pesticide Programs (H7505C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue N.W.
Washington DC 20460-0001

Subject: Ritter Chemical

Dear Mr. Gebken:

This letter serves as authorization, in accordance with our agreement with the registrant, to refer to the following data submitted by McLaughlin Gormley King Company to EPA for the subject company's registration.

MGK Data: Any and all data that may be relevant to this registration, including:

Analytical Method – 830.1800 MRID #46850801 – submitted to EPA Reg. No. 1021-461
MRID #40306301 – submitted to EPA Reg. No. 1021-88

Registrant's Product: Ritter's Flea & Tick Spray
EPA File Symbol: 9468-31

Although this is authorization to rely on MGK data for the subject company's subject registration, absolutely no data of a confidential nature is to be disclosed to them.

Sincerely,

McLAUGHLIN GORMLEY KING COMPANY

Julie B. Schlekau
Registration Specialist

7003 1680 0000 5218 1811

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only: No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
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PSN: <i>11620</i> Domestic Del. Agreement <i>11620</i> Street, Apt. No.: <i>1150 18th St. N.W.</i> Atlanta, GA or PO Box No.: <i>11620</i> Atlanta, GA 30336 City, State ZIP+4: <i>Atlanta, GA 30336</i> PS Form 3800, June 2002 See Reverse for Instructions	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 24 2007

CERTIFIED MAIL

Heather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Sciences Group, Inc.
1150 18th Street N.W. Suite 1000
Washington, D.C. 20036

SUBJECT: MGK Reregistration Eligibility Decision (RED) Review of Acute Toxicity Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter is in regard to your submission citing acute toxicity data in response to the MGK 326, (RED) Product Specific Data Call-In Notice. You cited acute toxicity studies below to support the reregistration of your product EPA Registration Number 9468-31

MRID NumberTest Material

155068, 41648602, 41800501
41648601, 41571501

MGK Repellent 326: 97.0%

41826505

EPA Reg. No. 1021-1600; MGK 326: 2.5%,
MGK 264: 5.0%, DEET: 25.0%)

151441

EPA Reg No. 270-347; MGK 326: 1.0%,
MGK 264: 2.0% butoxypolypropylene glycol:
5.0%, PBO: 0.5%, Pyrethrin: 0.2%, Permethrin:
0.2%)

15542 & 155430

Flysect concentrate #09195 - Actives unknown.

Due to the wide variation of active ingredients contained in the materials tested and percentages of these actives none of the studies listed above can be cited to support the reregistration of EPA Reg. No. 9468-31. New studies must be conducted on the subject product or cited from one of the products listed in the same batch as the subject product.

CONCURRENCES

SYMBOL	PRB	7508P						
SURNAME	BRISCOE	Propot						
DATE	4-17-07	4/24/07						

The Acute toxicity profile for EPA Registration No. 9468-31 is currently:

81-1,	Acute Oral	Data Needed
81-2	Acute Dermal	Data Needed
81-3,	Acute Inhalation	Data Needed
81-4,	Primary Eye	Data Needed
81-5,	Primary Dermal	Data Needed
81-6,	Skin Sensitization	Data Needed

Within 30 days from your receipt of this letter you must cite acceptable studies or inform the Agency that you intend to conduct new studies to support the acute toxicity data requirements for EPA Registration number 9468-31. If you choose to conduct new studies, the data will be due 90 days from receipt of this letter. Your failure to submit this data within these time frames may result in your receiving a Notice of Intent to Suspend your product. A copy of the Agency's Data Evaluation Record is enclosed. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 26, 2007

MEMORANDUM:

Subject: EPA Reg. No.: 9468-31/Ritter's Flea & Tick Spray
DP Barcode: 337773
Case No.: 0002

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Marianne Lewis 3/26/07

To: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Ritter Chemical LLC
P.O. Box 430974
Houston, TX 77243

FORMULATION FROM EPA Reg. No. 9468-31 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
MGK 326	0.50%
MGK 264	0.50%
PBO	1.50%
Pyrethrin	0.15%
<u>Inert Ingredient(s):</u>	<u>97.35%</u>
Total	100.00%

BACKGROUND: In the 8 month response to the MGK 326 RED, the registrant has submitted acute toxicity studies to support the reregistration of their product, EPA Reg. No. 9468-31. The MRID's are as follows: 155068, 416486-02, 416486-01, 418005-01, 415715-01 (test material used was MGK Repellent 326: 97.0%); 418265-05 (test material used EPA Reg. No. 1021-1600; MGK 326: 2.5%, MGK 264: 5.0%, Deet: 25.0%); 151441 (test material used EPA Reg. No. 270-347; MGK 326: 1.0%, MGK 264: 2.0%, butoxypolypropylene glycol: 5.0%, PBO: 0.5%, Pyrethrin: 0.2%, Permethrin: 0.2%); 15542 & 155430 (test material used Flysect Concentrate #09195 – actives unknown). Due to the wide variation of active ingredients contained in the materials tested and percentages of these actives none of the studies listed above can be cited to support the reregistration of EPA Reg. No. 9468-31. New studies conducted on the subject product or on one of the products listed in the same batch as the subject product should be cited or submitted for review.

RECOMMENDATIONS:

- The request to cite the studies listed above is denied. New studies conducted on the subject product or on one of the products listed in the same batch as the subject product should be cited or submitted for review.

The acute toxicity profile for EPA Reg. No. 9468-31 is currently:

Acute Oral	Data Needed
Acute Dermal	Data Needed
Acute Inhalation	Data Needed
Primary Eye	Data Needed
Primary Dermal	Data Needed
Skin Sensitization	Data Needed

NOTE: The labeling will be completed upon receipt of the required information.

Exec. Rep. (only in CD)



WASHINGTON

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

March 7, 2007

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Response to EPA letter dated February 27, 2007

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision to satisfy the acute toxicity data requirements. We believe that this submission satisfies the product specific re-registration data requirements as discussed in the EPA letter referenced above.

You will find the following in support of this product:

- 1) EPA Re-registration Application Form,
- 2) Certification with Respect to Data Citation (revised), and
- 3) Data Matrices (confidential and non-confidential versions - revised).

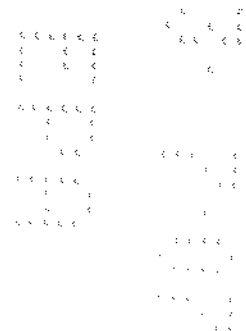
CANADA

275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>2/27/07</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 and the EPA letter from Linda Propst.

Section - III

1. Material This Product Will Be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Heather R. Bjornson, Technology Sciences Group, Inc.	Title Regulatory Agent	Telephone No. (Include Area Code) (202) 828-8945
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Agent for Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson	5. Date March 7, 2007	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel:713-461-2262	EPA Registration Number/File Symbol 9468-3 t
Active Ingredient(s) and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide	Date March 7, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

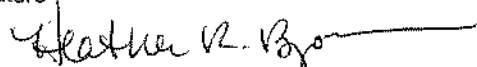
Signature <i>Heather R. Bjornson</i>	Date 03/07/2007	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agency
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

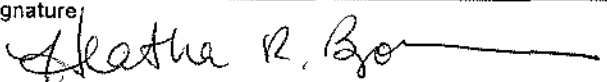
Date March 7, 2007	EPA Reg. No./File Symbol 9468-31	Page 1 of 3
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	00161127 40306301 43033201	McLaughlin Gormley King Corp.	PER	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	41605102 42321101 42757901 43015101 43452501 46850801	McLaughlin Gormley King Corp.	PER	
OPPTS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent	Date March 7, 2007	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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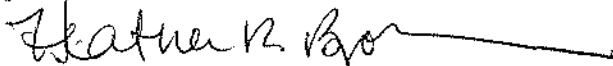
DATA MATRIX

Date March 7, 2007			EPA Reg. No./File Symbol 9468-31	Page 2 of 3	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6317	Storage Stability	"Cite-all"			
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	"Cite-all"			
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	00155068 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.1200	Acute Dermal Toxicity	41648601 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.1300	Acute Inhalation Toxicity	41571501 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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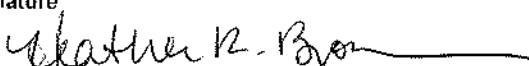
DATA MATRIX

Date March 7, 2007			EPA Reg. No./File Symbol 9468-31		Page 3 of 3
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 870.2400	Primary Eye Irritation	41800501 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.2500	Primary Skin Irritation	41826505 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.2600	Skin Sensitization	41648602 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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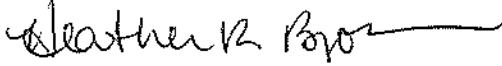
DATA MATRIX

Date March 7, 2007		EPA Reg. No./File Symbol 9468-31		Page 1 of 3	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243		Product Ritter's Flea & Tick Spray			
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			McLaughlin Gormley King Corp.	PER	
			McLaughlin Gormley King Corp.	PER	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

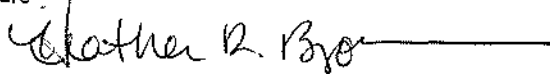
Date March 7, 2007		EPA Reg. No./File Symbol 9468-3t		Page 2 of 3	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date March 7, 2007		EPA Reg. No./File Symbol 9468-31		Page 3 of 3	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Buloxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals OLD OLD OLD OLD	OLD OLD OLD OLD	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

**WASHINGTON**

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

May 3, 2007

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)**Response to EPA letter dated April 24, 2007****SACRAMENTO**

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision to satisfy the acute toxicity data requirements. The enclosed data matrix cites the acute toxicity data submitted to support Equicare Flysect Repellent Face Lotion (EPA Reg. No. 270-305). The active ingredients in the Equicare Flysect product formulation is similar to Ritter's Flea and Tick Spray, see Table 1 for a formulation comparison.

Table 1. Formulation Comparison between Ritter's Flea and Tick Spray and Equicare Flysect Repellent Face Lotion

	Amount in Ritter's Flea and Tick	Amount in EquiCare Flysect
MGK Repellent 326	0.50%	1.00%
MGK 264	0.50%	0.50%
Pyrethrins	0.15%	0.15%
Piperpnyl Butoxide	1.50%	1.00%
Total	2.65%	2.65%

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

You will find the following in support of this product:

- Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsqusa.com.

Walter R. Byr

[illegible]



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>2/27/07</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 and the EPA letter from Linda Propst.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.	5. Location of Label Directions <input checked="" type="checkbox"/>		
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC			
4. Typed Name Heather R. Bjornson		5. Date March 7, 2007			

Sent To Mrs. Heather Byrneson
Street Apt. No. 170 Box 46
155 18th St. N.W. Ste 1000
City, State, Zip
Washington, DC 20036

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

MLK-3126 (Rev)
 Print, type, date
 call 800-451-1111
 enclosed Receipt;
 #4468-31

U.S. Postal Service
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(Domestic Mail Only, No Insurance Coverage Provided)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 27 2007

CERTIFIED MAIL

Ms. Heather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Sciences Group Inc.
1150 18th Street, N.W. Suite 1000
Washington, D. C. 20036

SUBJECT: MGK-326, Reregistration Eligibility Decision, (RED), Product Specific Data Call
In Notice, Overdue Response to Data Call In Requirements
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter confirms that Ritter Chemical is not in compliance with the MGK-326 RED, Product Specific Data Call In Notice issued April 27, 2005. Specifically, Ritter Chemical failed to submit an adequate 8 month response to the Data Call In Notice requirements. On October 6, 2006 as Regulatory Agent for Ritter Chemical, you submitted a response which included supporting documentation and a commitment to support the data requirements of the Notice. However, you did not include sufficient information to support the acute toxicity data requirements. To achieve compliance you must submit the acute toxicity data or a corrected Data Matrix which includes MRID(s) of acceptable/cited data which support your product.

You are required to submit this information within thirty days from your receipt of this letter. A Notice of Intent to Suspend MGK-326 product, EPA Reg. Number 9468-31 will be issued if you fail to meet this time frame. If you have any questions, please contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division

CONCURRENCES							
SYMBOL	PRB	7508.P					
SURNAME	Briscoe	Propst					
DATE	2-27-07	2/27/07					

7000 1670 0012 8253 1274

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only. No Insurance Coverage Provided)	
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 15 2006

CERTIFIED MAIL

Ms. Heather Bjornson
Technology Sciences Group, Inc.
Agent for Ritter Chemical, LLC
1101 17th Street, N.W. Suite 500
Washington, D.C. 20036

SUBJECT: MGK-326 Reregistration Eligibility Decision, (RED), Product Specific Data Call In
Notice, Overdue Response to Data Call In Requirements
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter notifies you that Ritter Chemical, LLC is not in compliance with the MGK-326 RED, Product Specific Data Call In Notice issued April 27, 2005. Specifically, Ritter Chemical, LLC has failed to submit an adequate response to the 90 day and 8 month Data Call-In Notice requirements. If you intend to satisfy the Notice requirements you must submit the following information:

- 1) Application for Reregistration (EPA Form 8570-1)
- 2) Five copies of draft labeling
- 3) Two copies of Confidential Statement of Formula (CSF) (EPA Form 8570).
- 4) Product Chemistry and Acute Toxicity Data or Authorization to Cite Data
- 5) Certification with Respect to Data Compensation Requirements
- 6) Responses to Product Specific Data Call In as instructed in DCI attachments
- 7) Data Matrix

The forms are available on the EPA website, <http://www.epa.gov/opprd001/forms>. You must submit this information within ten (10) days from your receipt of this letter. A Notice of Intent to Suspend your products, indicated above, will be issued if you fail to meet this time frame. If you have any questions, please contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and
Reregistration Division

CONCURRENCES							
SYMBOL	PRB	7508P					
SURNAME	Briscoe	Propst					
DATE	6-13-06	6/15/06					102



Barbara
Briscoe/DC/USEPA/US
12/10/2008 12:45 PM

To Terria Northern/DC/USEPA/US
cc
bcc
Subject Re: Suspension Information

Hi Terria

I will deliver in a few minutes the Suspension Information for MGK-326 product 9468-31.
I have included the following in the package

Appendix I, Product List

Explanatory History, Appendix III for MGK-326

Copies of lettes from PRB to Ritter Chemicals

1 letter from Ritter (Agent Heather Bjornston)

Summary Information for 9468-31 (fyl - not part of the Suspension)

Sample Copy of letter to Phil Ross (I can e-mail you the copy if you want it)

Please le me know is you need anything else.
Barbara 308 8177

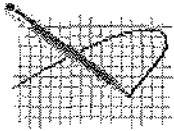
**Summary Information For
Company 9468, RITTER CHEMICAL, LLC**

Company No: 9468
Company Name: RITTER CHEMICAL, LLC
Division Name:
Office Name:
Branch Name:
Agent Name: TECHNOLOGY SCIENCES GROUP, INC
Agent Contact: HEATHER BJORNSON
Agent Phone: (202) 828-8945
Official Address: 1101 17TH STREET, NW, SUITE 500
WASHINGTON, District of Columbia 200376

UNITED STATES

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Last updated on February 4, 2004, Version 1.4
<http://dcopp10gas01:7777/pls/prism10p>



Terria
Northern/DC/USEPA/US
12/08/2008 10:17 AM

To Barbara Briscoe/DC/USEPA/US@EPA
cc Karen Jones/DC/USEPA/US@EPA, Bonnie
Adler/DC/USEPA/US@EPA, Patricia
Moe/DC/USEPA/US@EPA

bcc

Subject Suspension Information

Barbara - I have received the suspension candidates list you provided Pete on 9/25/08. Can you please supply me with background material to create your packages for MGK-326 and Fluometuron?

Thanks!

Terria C. Northern
EPA/OPPTS/OPP/SRRD
Office# 703-305-7093



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>9/8/2006</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 and to the EPA Letter Dated June 15, 2006.

Section - III

t. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.	
5. Location of Label Directions <input checked="" type="checkbox"/>		6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____	

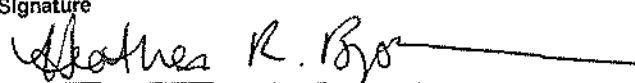
Section - IV

i. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson		5. Date October 5, 2006	

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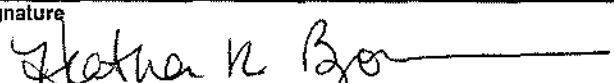
DATA MATRIX

Date October 5, 2006				EPA Reg. No./File Symbol 9468-31	Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243				Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
DPPTS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	00161127 40306301 43033201	McLaughlin Gormley King Corp.	PER	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	41605102 42321101 42757901 43015101 43452501 46850801	McLaughlin Gormley King Corp.	PER	
OPPTS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
DPPTS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 5, 2006			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6317	Storage Stability	"Cite-all"			
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	"Cite-all"			
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	"Cite-all"			
OPPTS 870.1200	Acute Dermal Toxicity	"Cite-all"			
OPPTS 870.1300	Acute Inhalation Toxicity	"Cite-all"			
OPPTS 870.2400	Primary Eye Irritation	"Cite-all"			
OPPTS 870.2500	Primary Skin Irritation	"Cite-all"			
OPPTS 870.2600	Skin Sensitization	"Cite-all"			
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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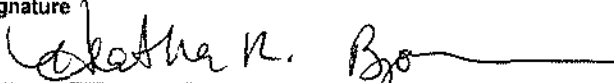
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Date October 5, 2006			EPA Reg. No./File Symbol 9468-31	Page 1 of 2	
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	DWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			McLaughlin Gomley King Corp.	PER	
			McLaughlin Gomley King Corp.	PER	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 5, 2006			EPA Reg. No./File Symbol 9468-3t	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel: 713-461-2262	EPA Registration Number/File Symbol 9468-31
Active Ingredients and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid	Date October 5, 2006
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Heather R. Bjornson</i>	Date 10/05/2006	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agent
---	--------------------	--



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

October 6, 2006

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Response to EPA letter dated September 8, 2006

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision. We believe that this submission satisfies the product specific re-registration data requirements as discussed in the EPA letter referenced above.

You will find the following in support of this product:

- 1) EPA Re-registration Application Form,
- 2) Certification with Respect to Data Citation (revised),
- 3) Data Matrices (confidential and non-confidential versions - revised), and
- 4) Letter Authorizing Ritter Chemical to cite data submitted by McLaughlin Gormley King.

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson

Heather R. Bjornson
Regulatory Agent for Ritter Chemical

E-mail tsg@tsgusa.com

<http://www.tsgusa.com>

received
10/10/06
112
HBR



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>9/8/2006</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 and to the EPA Letter Oated June 15, 2006.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

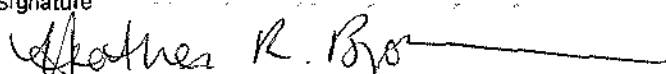
Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application..)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Data Application Received (Stamped) <div style="text-align: right; font-size: 24pt;">113</div>
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson		5. Date October 5, 2006	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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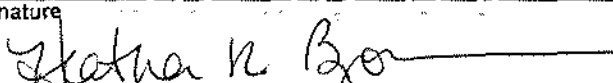
DATA MATRIX

Date October 5, 2006			EPA Reg. No./File Symbol 9468-31		Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	00161127 40306301 43033201	McLaughlin Gormley King Corp.	PER	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	41605102 43015101 42321101 43452501 42757901 46850801	McLaughlin Gormley King Corp.	PER	
OPPTS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 5, 2006		EPA Reg. No./File Symbol 9468-31		Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6317	Storage Stability	"Cite-all"			
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	"Cite-all"			
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	"Cite-all"			
OPPTS 870.1200	Acute Dermal Toxicity	"Cite-all"			
OPPTS 870.1300	Acute Inhalation Toxicity	"Cite-all"			
OPPTS 870.2400	Primary Eye Irritation	"Cite-all"			
OPPTS 870.2500	Primary Skin Irritation	"Cite-all"			
OPPTS 870.2600	Skin Sensitization	"Cite-all"			
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006

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401 M Street, S.W. WASHINGTON, D.C. 20460

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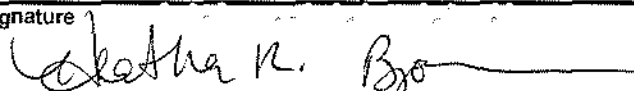
DATA MATRIX

Date October 5, 2006			EPA Reg. No./File Symbol 9468-31	Page 1 of 2	
Applicant's/Registrant Name and Address Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			McLaughlin Gormley King Corp.	PER	
			McLaughlin Gormley King Corp.	PER	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
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			Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006

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DATA MATRIX

Date October 5, 2006			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
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			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date October 5, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel: 713-461-2262

EPA Registration Number/File Symbol
 9468-31

Active Ingredient(s) and/or representative test compound(s)
 Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid

Date
 October 5, 2006

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 Residential Indoor

Product Name
 Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature
Heather R. Bjornson

Date
 10/05/2006

Typed or Printed Name and Title
 Heather R. Bjornson, Regulatory Agent

Text Label without graphics, pictures and illustrations

**Ritter's
Flea & Tick Spray**

FOR CATS – KITTENS – PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats, and Horses, and
For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl butoxide, technical.....1.50%
(N-octyl bicycloheptene dicarboximide).....0.50%
(Di-n-propyl isocinchomeronate).....0.50%
****Other Ingredients:**97.35%
Total:.....100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

**WARNING
Keep Out of Reach of Children**

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product in or around electrical equipment due to possibility of shock hazard.

USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.

Do not use on horses or foals intended for slaughter.

Do not apply over cuts, wounds, or irritated skin.

Do not apply near eyes and mouth. Apply sparingly around ears.

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

Puppies and Kittens:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors.

Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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Street, Apt. No.: <i>150 18th St NW Ste 100</i>	
or PO Box No.:	
City, State, ZIP: <i>Washington, DC 20001</i>	
PS Form 3800, June 2002 See Reverse for Instructions	

Account Used
Rev'd Paid
Elm P. Office
0468-21

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- 8 2006

CERTIFIED MAIL

Heather R. Bjornson, Regulatory Agency
Technology Sciences Group, Inc.
1150 18th Street, N.W. S. 1000
Washington, D.C. 20036

SUBJECT: MGK-326 Reregistration Eligibility Decision (RED) Review of Product Chemistry Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter is in regard to your submission of product chemistry data in response to the MGK-326 (RED) Product Specific Data Call-In Notice. The Agency has made the following determinations:

- The Confidential Statement of Formula, (CSF) for the basic formulation dated June 27, 2006 is acceptable.
- Except for the items below, the data you submitted in MRID Number 46873401 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity, Composition and Analysis, and Physical and Chemical Properties.
- The information you submitted in MRID Number 46873401 proposing a waiver of the Storage Stability requirement based on the expectation that the product will be stable when stored in the original container for one year is not acceptable. The actual study must be conducted, in full compliance with the GLP standards and the results (showing change or no change in active ingredient concentrations over time) must be submitted for review. The Guideline 830.6317 is outstanding.
- There are no data available to support the claim that the product is not corrosive to several types of containers (MRID number 46873401). The Corrosion Characteristics testing must be conducted for a period of one year (preferably along with the Storage Stability study) in the product's commercial container at room temperature. Guideline 830.6320 is outstanding.
- Guideline 830.1800, Enforcement Analytical Method, is not fulfilled because you did not submit the methods for analysis of MGK 264 and MGK 326. The Guideline 830.1800 is outstanding.

You are required to cite or submit the Storage Stability, Corrosion Characteristics and Enforcement Analytical Method studies. Within 30 day from your receipt of this letter you must cite acceptable data or inform the Agency by return letter if you intend to conduct new studies. The proposed completion dates for new studies must be included. Failure to submit this data within this time frame may result in your receiving a Notice of Intent to Suspend your product. A copy of the Agency's Data Evaluation Record is enclosed. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division
Special Review and Reregistration Division

CONCURRENCES

SYMBOL	7508 P							
SURNAME	Propst							
DATE	9/8/06							123

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

EPA - 8 2006

CERTIFIED MAIL

Heather R. Bjornson, Regulatory Agency
Technology Sciences Group, Inc.
1150 18th Street, N.W. S. 1000
Washington, D.C. 20036

SUBJECT: Diuron. Reregistration Eligibility Decision (RED) Review of Product Chemistry Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

This letter is in regard to your submission of product chemistry data in response to the Diuron (RED) Product Specific Data Call-In Notice. The Agency has made the following determinations:

- The Confidential Statement of Formula, (CSF) for the basic formulation dated June 27, 2006 is acceptable.
- Except for the items below, the data you submitted in MRID Number 46873401 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity, Composition and Analysis, and Physical and Chemical Properties.
- The information you submitted in MRID Number 46873401 proposing a waiver of the Storage Stability requirement based on the expectation that the product will be stable when stored in the original container for one year is not acceptable. The actual study must be conducted, in full compliance with the GLP standards and the results (showing change or no change in active ingredient concentrations over time) must be submitted for review. The Guideline 830.6317 is outstanding.
- There are no data available to support the claim that the product is not corrosive to several types of containers (MRID number 46873401). The Corrosion Characteristics testing must be conducted for a period of one year (preferably along with the Storage Stability study) in the product's commercial container at room temperature. Guideline 830.6320 is outstanding.
- Guideline 830.1800, Enforcement Analytical Method, is not fulfilled because you did not submit the methods for analysis of MGK 264 and MGK 326. The Guideline 830.1800 is outstanding.

You are required to cite or submit the Storage Stability, Corrosion Characteristics and Enforcement Analytical Method studies. Within 30 day from your receipt of this letter you must cite acceptable data or inform the Agency by return letter if you intend to conduct new studies. The proposed completion dates for new studies must be included. Failure to submit this data within this time frame may result in your receiving a Notice of Intent to Suspend your product. A copy of the Agency's Data Evaluation Record is enclosed. If you have any questions, regarding this letter you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and Reregistration Division

CONCURRENCES

SYMBOL	PNB	7508 P						
SURNAME	Propst	Propst						
DATE	9/1/06	9/8/06						124

OFFICIAL FILE COPY

VOLUME 1 OF 2 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Ritter Chemical LLC
P.O Box 430974
Houston, TX 77243

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Reregistration Eligibility Decision

TRANSMITTAL DATE:

June 27, 2006

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 2	(Transmittal Document)	-----
46873401	2 of 2	Product Properties- Parts A & B Ritter's Flea & Tick Spray	830.1550 – 830.7300 830.6302 – 830.7950

COMPANY NAME: Ritter Chemical LLC

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 5, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

TECHNOLOGY SCIENCES GROUP, INC
RITTER CHEMICAL, LLC
1101 17TH STREET, NW, SUITE 500
WASHINGTON, DC 20037-6

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 29-JUN-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

**WASHINGTON**

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

June 27, 2006

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Response to Data Call In Notice Dated April 27, 2005

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Reregistration Eligibility Decision. Because the registrant is traveling and not able to provide me with the hard copy of the data call in, I do not have the DCI response form or the requirement status form so a response cannot be sent to Twanda Spears at this time. Please send these forms to my attention at: Technology Sciences Group, Inc. 1850 18th Street NW, Suite 1000, Washington DC 20036.

You will find the following in support of this product:

- 1) EPA Reregistration Application Form,
- 2) CSF (two copies),
- 3) Formulator's Exemption Form,
- 4) Certification with Respect to Data Citation,
- 5) Data Matrices (confidential and non-confidential versions),
- 6) Five copies of the revised product labeling,
- 7) Transmittal Document, and
- 8) Revised Product Chemistry Volume (Three copies)

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical

VOLUME 1 OF 2 OF SUBMISSION

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Ritter Chemical LLC
P.O Box 430974
Houston, TX 77243

REGULATORY ACTION:

Response to Data Call IN for MGK-326 Reregistration Eligibility Decision

TRANSMITTAL DATE:


June 27, 2006

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 2	(Transmittal Document)	-----
46673401	2 of 2	Product Properties- Parts A & B Ritter's Flea & Tick Spray	830.1550 – 830.7300 830.6302 – 830.7950

COMPANY NAME: Ritter Chemical LLC

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Agent

COMPANY CONTACT:

Heather R. Bjornson, Regulatory Agent
Technology Sciences Group, Inc.
1150 18th Street, N.W. Ste. 1000
Washington, DC 20036
(202) 828-8945



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel: 713-461-2262	EPA Registration Number/File Symbol 9468-31
Active Ingredient(s) and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid	Date March 7, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Heather R. Bjornson</i>	Date 03/07/2007	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agent
---	--------------------	--



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Ritter Chemical LLC
P.O. Box 430974
Houston, TX 77243

EPA File Symbol/Registration Number

9468-31

Product Name

Ritter's Flea & Tick Spray

Date of Confidential Statement of Formula (EPA Form 8570-4)

June 27, 2006

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Pyrethrins and Piperonyl Butoxide		
Di-n-propyl-isocinchomeronate	MGK Repellent 326	1021-461
N-octyl-bicycloheptane dicarboximide		
Signature	Name and Title	Date
<i>Heather R. Bjornson</i>	Heather Bjornson, Regulatory Consultant	<i>June 27, 2006</i>



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>2/27/07</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 and the EPA letter from Linda Propst.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson		5. Date March 7, 2007	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 439874, Houston, TX 77243 Tel: 713-461-2262	EPA Registration Number/File Symbol 9468-31
Active Ingredient(s) and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide	Date March 7, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Heather R. Bjornson</i>	Date 03/07/2007	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agent
---	--------------------	--



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Ritter Chemical LLC
P.O. Box 430974
Houston, TX 77243

EPA File Symbol/Registration Number

9468-31

Product Name

Ritter's Flea & Tick Spray

Date of Confidential Statement of Formula (EPA Form 8570-4)

June 27, 2006

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Pyrethrins and Piperonyl Butoxide		
Di-n-propyl-isocinchomeronate	MGK Repellent 326	1021-461
N-octyl-bicycloheptane dicarboximide		
Signature	Name and Title	Date
<i>Heather R. Bjornson</i>	Heather Bjornson, Regulatory Consultant	June 27, 2006



Heather Bjornson
<HBjornson@TSGUSA.COM
>

10/04/2006 02:06 PM

To: Barbara Briscoe/DC/USEPA/US@EPA
cc: Linda Propst/DC/USEPA/US@EPA
bcc:
Subject: Ritter Flea and Tick Spray re-Registration (EPA Reg. No. 9468-31)

Barb-

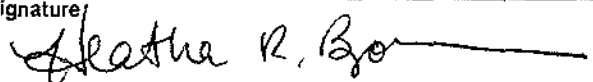
I just wanted to give you the heads up that I will be submitting additional information on Friday to support the re-registration of Ritter Chemical's flea and Tick product. I am awaiting a letter of authorization from MGK for Ritter to cite the analytical methods.

Regards,
Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th Street NW, Suite 1000
Washington DC 20036
Tel.: (202) 828-8945
Fax: (202) 872-0745

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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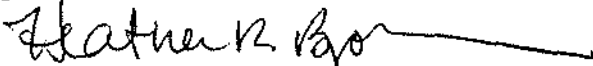
DATA MATRIX

Date March 7, 2007			EPA Reg. No./File Symbol 9468-31	Page 2 of 3	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6317	Storage Stability	"Cite-all"			
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	"Cite-all"			
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	00155068 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.1200	Acute Dermal Toxicity	41648601 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.1300	Acute Inhalation Toxicity	41571501 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

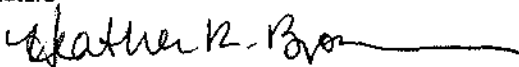
Date March 7, 2007			EPA Reg. No./File Symbol 9468-31	Page 3 of 3	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 870.2400	Primary Eye Irritation	41800501 0015144 t 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.2500	Primary Skin Irritation	41826505 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 870.2600	Skin Sensitization	41648602 00151441 00155422 00155430	MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"			
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

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DATA MATRIX

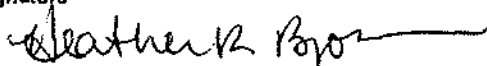
Date March 7, 2007	EPA Reg. No./File Symbol 9468-31	Page 1 of 3
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			McLaughlin Gormley King Corp.	PER	
			McLaughlin Gormley King Corp.	PER	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2008 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent	Date March 7, 2007	

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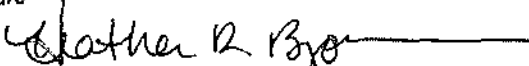
Date March 7, 2007			EPA Reg. No./File Symbol 9468-3t	Page 2 of 3	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

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Form Approved OMB No. 2070-0060

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Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals	OLD OLD OLD OLD	
			MGK Pet Chemicals Pet Chemicals Pet Chemicals OLD OLD OLD OLD	OLD OLD OLD OLD	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

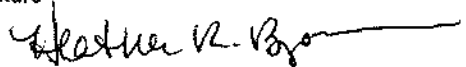
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Form Approved OMB No. 2070-0060

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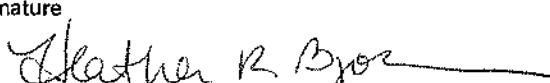
DATA MATRIX

Date March 7, 2007	EPA Reg. No./File Symbol 9468-31	Page 1 of 3
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Production Process	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	4687340 t	Ritter Chemical LLC	OWN	06/27/2008 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	0016 t127 40306301 43033201	McLaughlin Gormley King Corp.	PER	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	41605 t02 4232 t101 42757901	430 t510 t 43452501 46850801 McLaughlin Gormley King Corp.	PER	
OPPTS 830.6302	Color	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6303	Physical State	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6314	Oxidation/Reduction	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	4687340 t	Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date March 7, 2007

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Date May 3, 2007			EPA Reg. No./File Symbol 9468-31		Page 1 of 2
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchoneronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1600	Description of Production Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1620	Description of the Formulation Process	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1750	Certified Limits	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.1800	Enforcement Analytical Method (MGK 264)	00161127 40306301 43033201	McLaughlin Gormley King Corp.	PER	
OPPTS 830.1800	Enforcement Analytical Method (MGK 326)	41605102 43015101 42321101 43452501 42757901 46850801	McLaughlin Gormley King Corp.	PER	
OPPTS 830.6302	Color	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6303	Physical State	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6304	Odor	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6314	Oxidation/Reduction	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6315	Flammability	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6316	Explosibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date May 3, 2007

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Date May 3, 2007			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6317	Storage Stability	"Cite-all"			
OPPTS 830.6319	Miscibility	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.6320	Corrosion Characteristics	"Cite-all"			
OPPTS 830.7000	pH	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7100	Viscosity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity	46873401	Ritter Chemical LLC	OWN	06/27/2006 Submission
OPPTS 870.1100	Acute Oral Toxicity	46812902	Farnam Companies, Inc.	PAY	
OPPTS 870.1200	Acute Dermal Toxicity	46812903	Farnam Companies, Inc.	PAY	
OPPTS 870.1300	Acute Inhalation Toxicity	46812904	Farnam Companies, Inc.	PAY	
OPPTS 870.2400	Primary Eye Irritation	46812905	Farnam Companies, Inc.	PAY	
OPPTS 870.2500	Primary Skin Irritation	46812906	Farnam Companies, Inc.	PAY	
OPPTS 870.2600	Skin Sensitization	46812907	Farnam Companies, Inc.	PAY	
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges	"Cite-all"		PAY	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date May 3, 2007



WASHINGTON

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Linda Propst
Barbara Briscoe
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

March 7, 2007

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 9468-31)

Response to EPA letter dated February 27, 2007

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

Dear Ms. Propst and Ms. Briscoe:

On behalf of Ritter Chemical LLC, Technology Sciences Group is submitting the enclosed product specific response to the data call in for MGK-326 Re-registration Eligibility Decision to satisfy the acute toxicity data requirements. We believe that this submission satisfies the product specific re-registration data requirements as discussed in the EPA letter referenced above.

You will find the following in support of this product:

- 1) EPA Re-registration Application Form,
- 2) Certification with Respect to Data Citation (revised), and
- 3) Data Matrices (confidential and non-confidential versions - revised).

CANADA

275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>4/24/2007</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. [For section I and Section II.]

This is in response to the Data Call In Notice issued April 27, 2005 and the EPA letter from Linda Propst.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
					Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Data Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC			
4. Typed Name Heather R. Bjornson		5. Date May 3, 2007			


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**401 M Street, S.W.
WASHINGTON, D.C. 20460**

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel: 713-461-2262	EPA Registration Number/File Symbol 9468-31
Active Ingredient(s) and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid	Date April 3, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Heather R. Bjornson</i>	Date 05/03/2007	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agent
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Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243	Product Ritter's Flea & Tick Spray	
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			McLaughlin Gormley King Corp.	PER	
			McLaughlin Gormley King Corp.	PER	
			Ritter Chemical LLC	OWN	06/27/2006 Submission
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			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission

Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date May 3, 2007
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401 M Street, S.W. WASHINGTON, D.C. 20460

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Date May 3, 2007			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Ritter Chemical LLC	OWN	06/27/2006 Submission
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
			Farnam Companies, Inc.	PAY	
		"cite-all"		PAY	
Signature <i>Heather R. Bjornson</i>			Name and Title Heather R. Bjornson, Regulatory Agent		Date May 3, 2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ritter Chemical LLC, P.O. Box 430974, Houston, TX 77243 Tel: 713-461-2262	EPA Registration Number/File Symbol 9468-31
Active Ingredient(s) and/or representative test compound(s) Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid	Date June 27, 2006
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor	Product Name Ritter's Flea & Tick Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.


I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Heather R. Bjornson</i>	Date 06/27/2006	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Agent
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

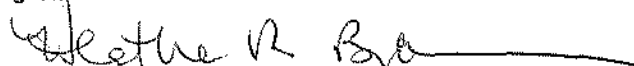
Date June 27, 2006			EPA Reg. No./File Symbol 9468-31	Page 1 of 2	
Applicant's/Registrant Name and Address Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.1550	Product Identity and Composition		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.1600	Description of Materials Used to Manufacture Product		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.1600	Description of Production Process		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.1620	Description of the Formulation Process		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.1670	Discussion of the Formation of Impurities		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.1750	Certified Limits		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.1800	Enforcement Analytical Method		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6302	Color		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6303	Physical State		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6304	Odor		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6314	Oxidation/Reduction		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6315	Flammability		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6316	Explosibility		Ritter Chemical LLC	OWN	06/21/1990 Submission
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date June 27, 2006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date June 27, 2006			EPA Reg. No./File Symbol 9468-31	Page 2 of 2	
Applicant's/Registrant Name and Address Ritter Chemical P.O. Box 430974 Houston, TX 77243			Product Ritter's Flea & Tick Spray		
Ingredient Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Butoxide, N-octyl-bicycloheptane dicarboximid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.6317	Storage Stability		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6319	Miscibility		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.6320	Corrosion Characteristics		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.7000	pH		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.7100	Viscosity		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 830.7300	Density, Bulk Density, Specific Gravity		Ritter Chemical LLC	OWN	06/21/1990 Submission
OPPTS 870.1100	Acute Oral Toxicity		"Cite-all"		
OPPTS 870.1200	Acute Dermal Toxicity		"Cite-all"		
OPPTS 870.1300	Acute Inhalation Toxicity		"Cite-all"		
OPPTS 870.2400	Primary Eye Irritation		"Cite-all"		
OPPTS 870.2500	Primary Skin Irritation		"Cite-all"		
OPPTS 870.2600	Skin Sensitization		"Cite-all"		
OPPTS 810.3400	Efficacy of Mosquitoes, Black Flies, and Midges		"Cite-all"		
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date June 27, 2006



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other - Reregistration

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. (For section I and Section II.)

This is in response to the Data Call In Notice issued April 27, 2005 and to the EPA Letter Dated June 15, 2006.

For Reregistration of MGK-326 (RED) Decision.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

Section - IV

t. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson		5. Date June 24, 2005	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 4, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MR. VON S. WELLS
RESEARCH LABORATORIES, INC.
PO Box 801854
HOUSTON, TX 77280-1854

Dear Mr. Wells:

Subject: Transfer of Pesticide Registrations and Data From Company Number 9468 to
Company Number 49784

Pursuant to your request in your letter and transfer agreement of June 18, 2007 and
subsequently received information, we have approved the transfer of the following registrations
from **RITTER CHEMICAL, LLC**, company number **9468** to **RESEARCH
LABORATORIES, INC.**, company number **49784**.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
RITTER'S FLEA & TICK SPRAY	9468-31	49784-4

You should indicate the new company designation, new EPA Registration Number and
new Establishment Number (if it has changed) on the labeling at the next printing which should
occur no later than 18 months after the effective date of this transfer. After 18 months, any
product released for shipment must bear the new Registration Number and Establishment
Number. If you intend to use the labels which currently appear on the transferor's product after
the effective date of the transfer, but within the 18 month grace period, you must maintain
complete and accurate records which identify by batch number, lot number, or other suitable
description the quantities of such product bearing the transferor's label. Each container or
package bearing the transferor's label which is released after the effective date of product
registration transfer, must be clearly and accurately marked with the batch number, lot number or
other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the
Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental
distributors of the transferred product(s) of this transfer agreement. If you wish to enter into
supplemental distribution agreements of your product(s) under this new registration, the form
"Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5,

must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges that it has received a request for data transfer dated June 18, 2007, and subsequently submitted information, to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **RESEARCH LABORATORIES, INC.** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

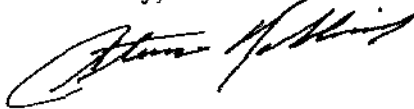
Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges that it has received a request for data transfer dated June 18, 2007, and subsequently submitted information, to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **RESEARCH LABORATORIES, INC.** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Robbins", is written over a horizontal line.

Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MS. HEATHER R. BJORNSON
TECHNOLOGY SCIENCES GROUP, INC, AGENT FOR
RITTER CHEMICAL, LLC
1150 18TH ST., N.W., SUITE 1000
WASHINGTON, DC 20036

L_9468_RAD_49784_02_04_2009



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) [b](i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 1/17/2008
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Heather R. Bjornson, Technology Sciences Group, Inc.	Title Regulatory Agent	Telephone No. (Include Area Code) (202) 828-6945
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Agent for Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson	5. Date October 20, 2008	

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
1-17-08

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none"> Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product, container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health hazards, medical emergencies or pesticide ingredients), you may call 1-800-828-8388 or the National Pesticide Information Center at 1-800-858-7376.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Harmful if swallowed or inhaled. Avoid breathing spray mist. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of food or feedstuff.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface waters are present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use and additional precautions and use restrictions.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not apply this product around electrical equipment due to possibility of a shock hazard.

Ritter'sFlea & Tick Spray

FOR CATS – KITTENS – DOGS –
PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs,
Cats over 12 Weeks Old and Horses
For (temporarily) repelling Gnats, Mosquitoes and Biting Flies

Active Ingredients:

Pyrethrins	0.15%
*Piperonyl Butyrate, Technical	1.50%
** (N-octyl bicyclohexene dicarboximide)	0.50%
*** (O-n-propyl isocinchomeronate)	0.50%
**** Other Ingredients	97.35%
Total:	100.00%

* Equivalent to 1.2% (butylcyclohexyl) (6-propylpiperonyl) ether and 0.3% related compounds.
** MGK® 264 Insecticide Synergist
*** MGK® Repellent 326
**** Inert ingredients include a preening agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

WARNING

Keep out of reach of children

See side panels for additional Precautionary Statements

Manufactured For:
RITTER CHEMICAL LLC
P.O. Box 430914
Houston, TX 77243

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

NET CONTENTS:
32 FL. Oz. (946 mL)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES.

Read and follow all directions and precautions on this product label.

GENERAL PRECAUTIONS AND USE RESTRICTIONS

- Apply this product only as specified on this label.
- DO NOT apply this product around electrical equipment due to the possibility of shock hazard.
- Except when applying directly to pets, DO NOT allow adults, children or pets to enter treated area until sprays have dried.
- Remove pets, birds and other fish aquariums before spraying.
- DO NOT apply to pets less than 12 weeks old.
- Avoid spraying of genital areas.
- DO NOT use on horses or foals intended for slaughter.
- Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.
- Sensitivities may occur after using ANT pesticide for pets. (If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.)

Dogs and Cats: Cover animal's eyes with hand and with a firm tort stroke, to get proper spray mist. Spray head, ears and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing with legs last and paying special attention to the footpads (between toes) and underbody areas. Avoid spraying at genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long-haired dogs, rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Repeat treatment as necessary, but do not treat more than once per week.

Puppies and Kittens: Do Not Use On Puppies or Kittens Under 12 Weeks Old. Treat same as for dogs and cats, except nursing puppies and kittens. Spray only at one base or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects.

Pet Sleeping Quarters: For use in companion animal quarters only. Do not broadcast outdoors. Remove animals from quarters before treating premises. Spray around barboards, windows, door frames, wall cracks and focal areas of fleas. If mosquitoes, gnats or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Repeat treatment as necessary, but do not treat more than once a week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy.

Horses: To control stable flies, house flies and other face flies, apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as necessary, but do not treat more than once a week.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.
Pesticide Storage: Store this product only in original container, in a cool, dry area that is inaccessible to pets and children.
Pesticide Disposal: Empty: Do not reuse this container. Place in trash or other for recycling, if available. If partly filled: Call your local solid waste agency at 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

4.5" x 8.875" Rectangle
Prints Black with PMS 726 Light Brown tint background

REVISED 10-17-08

MATERIAL TO BE ADDED TO JACKET

REG # 9468-31

Description: _____

<i>check all that apply</i>		Send to CSC
<input checked="" type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input type="checkbox"/>	notification	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's Name: Carmen Rodia Date: 1-17-08
Phone: (703) 306-0327 Division: RO/IB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 17, 2008

Ms. Heather R. Bjornson,
Regulatory Agent for Ritter Chemical Company
c/o Technology Sciences Group, Inc.
1150 18th Street, NW, Suite 1000
Washington, DC 20036-3840

**Subject: Updates of First Aid, Storage and Disposal & Other Precautionary Statements
Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31
Your Submission Dated November 13, 2007**

Dear Ms. Bjornson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

Marketing Claims section comment(s):

1. Revise the 1st marketing claim to read: "FOR CATS – KITTENS – DOGS – PUPPIES – DOG HOUSES."
2. On the 2nd marketing claim, insert the words "Over 12 Weeks Old" immediately following the word "Cats."

Ingredient Statement section comment(s):

3. Replace this section with:

ACTIVE INGREDIENTS:

Pyrethrins	0.15%
*Piperonyl Butoxide, Technical	1.50%
** (N-octyl bicycloheptene dicarboximide)	0.50%
*** (Di-n-propyl isocinchomeronate)	0.50%
**** OTHER INGREDIENTS	97.35%
Total	100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ether and 0.30% related compounds.

**MGK® 264 Insecticide Synergist

***MGK® Repellent 326

****Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

First Aid section comment(s):

4. Replace the 4th and 5th rows of the existing First Aid section (table) with:

If on Skin or Clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx or the National Pesticide Information Center at 1-800-858-7378. ¹	

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

5. Delete all text in this section immediately following the signal word "**WARNING**" that has been marked with "~~strikethrough~~" and replace with: "Harmful if swallowed or inhaled. Avoid breathing spray mist. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of food or feedstuffs."

Precautionary Statements, Environmental Hazards subsection comment(s):

6. Replace the section with: "This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use for additional precautions and use restrictions."

Precautionary Statements, Physical or Chemical Hazards subsection comment(s):

7. Replace this section with: "Flammable. Keep away from heat and open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard."

Directions for Use section comment(s):

8. Delete all text in the introduction to the Directions for Use section immediately following the statement "It is a violation of ..." that has been marked with "~~strikethrough~~" and replace with:

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ONLY ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES. ²

Read and follow all directions and precautions on this product label. ³

General Precautions and Use Restrictions

- Apply this product only as specified on this label.
- **DO NOT** apply this product around electrical equipment due to the possibility of shock hazard.
- Except when applying directly to pets, **DO NOT** allow adults, children or pets to enter treated area until sprays have dried.
- Remove pets, birds and cover fish aquariums before spraying.
- **DO NOT** apply to pets less than 12 weeks old.
- Avoid spraying of genital areas.
- **DO NOT** use on horses or foals intended for slaughter.
- Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.
- Sensitivities may occur after using **ANY** pesticide for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

¹ Please note that the "1-800-xxx-xxxx" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

² For more detailed information on labeling claims permitted by the Agency, please refer to PR Notice 96-6.

³ This new General Precautions and Use Restrictions section is required by the Reregistration Eligibility Decision documents (REDs) for pyrethrins, piperonyl butoxide and MGK® 264 and replaces existing text deleted from various areas of the label.

Directions for Use, Cats and Dogs subsection comment(s):

9. Replace this subsection with: "**Dogs and Cats:** Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears and chest until damp. With finger tips, rub into face and around mouth, nose and eyes. Then spray neck, middle and hindquarters, finishing with legs last and paying special attention to the footpads (between the toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long-haired dogs, rub your hand against the lay of the hair, spraying the ruffed hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week."

Directions for Use, Puppies and Kittens subsection comment(s):

10. Replace this subsection with: "**Puppies and Kittens: Do not use on puppies or kittens under 12 weeks old.** Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects."

Directions for Use, Pet Sleeping Quarters subsection comment(s):

11. Replace this subsection with: "**Pet Sleeping Quarters:** For use in companion animal quarters only. Do not broadcast outdoors. Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy."

Directions for Use, Horses subsection comment(s):

12. Replace this subsection with: "**Horses:** To control stable flies, horse flies, deer flies and other face flies, apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week."

Storage and Disposal section comment(s):

13. Replace the existing section with the following:

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

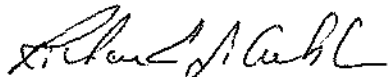
Pesticide Storage: Store this product only in original container in a cool, dry area that is inaccessible to pets and children.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling, if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Ritter Chemical Company should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). Further, EPA's RED for products containing MGK® 264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide and MGK® 264.

Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. A stamped copy of the label for this product is enclosed for your records. If you have any questions, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Enclosure

009468-00031 D386553

Text Label without graphics, pictures and illustrations

Ritter's
Flea & Tick Spray

FOR CATS – KITTENS – PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats, and Horses, and
For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl butoxide, technical.....1.50%
(N-octyl bicycloheptene dicarboximide).....0.50%
(Di-n-propyl isocinchomeronate).....0.50%
****Other Ingredients:**97.35%
Total:.....100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

WARNING
Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

ACCEPTED
with COMMENTS
In EPA Letter Dated
January 17, 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
9468-31

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<p>If you suspect a reaction to this product:</p> <ul style="list-style-type: none"> • Discontinue use. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31. You may also contact CHEMTREC at 1-800-424-9300 for emergency treatment information.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

~~**WARNING: NOT TO BE USED ON ANIMALS TO BE USED AS A SOURCE OF FOOD OR FEED**~~

~~**HUMANS:** Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contamination of food or foodstuffs. Wash hands with soap and water after using.~~

~~**ANIMALS:** Avoid contact with animal's eyes. Do not use on nursing animals. If treatment is necessary, spray on fingertips and rub into coat.~~

~~Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals.~~

~~Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.~~

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

~~Do not use this product in or around electrical equipment due to possibility of shock hazard.~~

~~USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.~~

~~Do not use on horses or foals intended for slaughter.~~

~~Do not apply over cuts, wounds, or irritated skin.~~

~~Do not apply near eyes and mouth. Apply sparingly around ears.~~

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

Puppies and Kittens:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors.

Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Decision Seq: 386553	Action Code: 900 LABEL REVISION/NO DATA REQUIRED: 90	Decision Status
FFS Start Date:	Tentative Ind: No	Tracking
Due Date: 12-Feb-2008	FFS Original Decision:	Create Resubmission
OPP Target Due Dt:	FFS EUP Decision:	FFS Letters
Negotiated Due Dt:	FFS Sec3 Decision:	Waiver Documentation
Registrant: [Redacted]	Start/Stop Clock: FQPA Clock:	
Response Due Date: [Redacted]	Days Elapsed:	
Current Status: PENDING (27-Nov-2007)		
Decision Comments	Payment	Unreceived Payment
Meetings & Milestones	FFS Information	FFS Negotiated Due Dates
Decision Ownership	Receipts	OPP Target Due Date
	Data Package	Reduced Risk
Receipts	Staff Member	Reg/DCI Number
S 219994	Rodriguez, Carmen	9468-31
		Submission Due Dt: 12-Feb-2008
		Response: PENDING
First Aid, Storage and Disposal and other precautionary statements.		

Viewing Record 1 of 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 16, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

HEATHER BJORNSON
TECHNOLOGY SCIENCES GROUP, INC
RITTER CHEMICAL, LLC
1101 17TH STREET, NW, SUITE 500
WASHINGTON, DC 20037-6

PRODUCT NAME: RITTER'S FLEA & TICK SPRAY
COMPANY NAME: RITTER CHEMICAL, LLC
EPA FILE SYMBOL: 9468-31
EPA RECEIPT DATE: 11/14/07

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 10, at (703) 305-6701.

Sincerely, *J. W. Rice*
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{819994b~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 10

Receipt No.

S- 819994

EPA File Symbol/Reg. No.

9468-31

Pin-Punch Date:

11/14/2007

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: J. Miller

Date: 11-16-07

Remarks:

Receipt for Section 3

S: 819994

Receipts: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee for Service: ☒ Yes ☐ No

Application Type: Amendment

Billable: ☒ Yes ☐ No

Company: 9468 RITTER CHEMICAL, LLC V

Risk Manager: Registration Division, Risk Management Team 10

Product #: 9468-31 Product Name: RITTER'S FLEA & TICK SPRAY

Overview:

Me Too Section3: Me Too Product Name:

Application Date: 13-Nov-2007 icl

OPP Rec'd Date: 14-Nov-2007 icl

Front End Date: 15-Nov-2007 icl

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

FAST TRACK AMENDMENT TO UPDATE FIRST AID, STORAGE AND DISPOSAL, AND OTHER PRECAUTIONARY STATEMENTS

New Ingredient Request Date:
New Ingredient Request Date:
New Ingredient Request Date:

Print Letter

Enter More Information

Tracking

Receipt Content



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-31	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. For section I and Section II.

Fast-track amendment to update First Aid, Storage and Stability and other Precautionary statements per PR Notices: 2001-1, 2001-6 and 1998-10.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent to Ritter Chemical LLC	
4. Typed Name Heather R. Bjornson		5. Date November 13, 2007	



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Richard Gebken
Registration Division (7504P)
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

November 13, 2007

RE: Ritter's Flea & Tick Spray (EPA Reg. No. 9468-31)

**Fast-track amendment to update first aid, storage and disposal,
and other precautionary statements**

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Mr. Gebken:

Technology Sciences Group, on behalf of Ritter Chemical LLC, is submitting the enclosed fast-track label amendment to update the above referenced product label. The updates are consistent with PR Notices: 2001-1, 2001-6, and 1998-10. The last stamped approved label was dated March 1996 and is included for reference.

You will find the following in support of this notification:

- 1) EPA Application Form,
- 2) Current label on file (dated March 1996), and
- 3) Three clean copies of the revised label.

Please do not hesitate to contact me with any questions at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

PRECAUTIONARY STATEMENTS **HAZARDS TO HUMANS & DOMESTIC ANIMALS**

WARNING

NOT FOR USE ON ANIMALS TO BE USED AS A SOURCE FOR FOOD OR FEED
 HUMAN: Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contact with skin or eyes. Avoid contamination of food or foodstuffs. Wash hands with soap and water after using.
 ANIMALS: Avoid contact with animal's eyes. Do not use on nursing animals. If treatment is necessary, spray on fingertips and rub into coat.

ENVIRONMENTAL HAZARDS
 This product is toxic to aquatic organisms. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS
FLAMMABLE: KEEP AWAY FROM HEAT OR OPEN FLAME.
STATEMENT OF PRACTICAL TREATMENT
 IF SWALLOWED: Do not induce vomiting. CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY.
 IF IN EYES: Flush with plenty of water. See a physician immediately.
 ON SKIN: Wash with soap and water. Get medical attention if irritation persists.

DIRECTIONS FOR USE
 It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use the product in or on medical equipment due to possibility of shock hazard.
 LOT NO - SEE BOTTOM OF BOTTLE

Ritter's **FLEA & TICK SPRAY**

FOR CATS - KITTENS - PUPPIES - DOG HOUSES
 For the control of Fleas, Ticks and Lice on Dogs, Cats and Horses, and for temporarily repelling Gnats, Mosquitoes and biting Flies.

ACTIVE INGREDIENTS:

Pyrethrin	0.15%
Permethrin	1.50%
Disodium (2-chlorophenyl) phosphorothioate	0.50%
Disodium (2-chlorophenyl) phosphorothioate	0.50%
Permethrin diisobutylate	1.35%
INERT INGREDIENTS	86.00%
TOTAL	100.00%

* Equivalent to 12% (pyrethrin) (6-propylphenyl) ester and 0.7% related compounds.
 - Inert ingredients include a propellant agent to ease combing and brushing of coat to remove dead fleas, ticks and lice.

KEEP OUT OF REACH OF CHILDREN **WARNING**

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS

MANUFACTURED FOR:
RITTER CHEMICAL COMPANY
 P.O. BOX 801854 HOUSTON, TX 77280
 EPA Registration No. 9468-31
 EPA Est. No. 47258-TX-01
NET CONTENTS
 16 FL. OZ. (473 ml)

DIRECTIONS:
 USE ONLY IN A WELL VENTILATED AREA. REMOVE BIRDS AND COVER AQUARIUMS BEFORE SPRAYING. REMOVE SAFETY CAP AND INSERT SPRAYER.

CATS AND DOGS: Cover animal's eyes with hand and with a pin fast this to get a proper spray mist. Spray head, ears, and jaw, and dump with finger for into face and around mouth, nose and eyes. Then spray neck, middle and hind quarters, rubbing legs last. For best penetration of spray to the skin, direct spray against the natural lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the animal's hair directly behind the hand. Make sure spray thoroughly wets skin. Repeat treatment as needed.

PUPPIES AND KITTENS: Treat same as cats and dogs except turn puppy's and kitten's spray only along back of on your finger for and rub in with your finger tips.

PET SLEEPING QUARTERS: Spray around headboards, windows, door frames, wall cracks and base area of room. If mosquitoes, gnats or flies are present, spray lightly into the air. Repeat as needed. The bedding should be turned and then replaced with fresh bedding for best results.

HORSES: To control stable flies, horse flies, deer flies and lice first spray in face, legs, flanks, loins and other body areas commonly attacked by these flies. Repeat treatment as needed.

STORAGE AND DISPOSAL

Do not contaminate food or foodstuffs by storage or disposal. Do not reuse empty container. Wrap empty container and put in trash collection.

ACCEPTED
 WITH COMMENTS
 In EPA Letter Dated

MAR 1996

Under the Federal Insecticide, Fungicide, and Rodenticide Act, 25 U.S.C. 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1438, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 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2989, 2990, 2991, 2992, 2993, 2994, 2995, 2996, 2997, 2998, 2999, 3000, 3001, 3002, 3003, 3004, 3005, 3006, 3007, 3008, 3009, 3010, 3011, 3012, 3013, 3014, 3015, 3016, 3017, 3018, 3019, 3020, 3021, 3022, 3023, 3024, 3025, 3026, 3027, 3028, 3029, 3030, 3031, 3032, 3033, 3034, 3035, 3036, 3037, 3038, 3039, 3040, 3041, 30

Text Label without graphics, pictures and illustrations

**Ritter's
Flea & Tick Spray**

FOR CATS – KITTENS – PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats, and Horses, and
For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl butoxide, technical.....1.50%
(N-octyl bicycloheptene dicarboximide).....0.50%
(Di-n-propyl isocinchomeronate).....0.50%
****Other Ingredients:**97.35%
Total:.....100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

**WARNING
Keep Out of Reach of Children**

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If on skin or clothing	<p>If you suspect a reaction to this product:</p> <ul style="list-style-type: none">• Discontinue use.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31. You may also contact CHEMTREC at 1-800-424-9300 for emergency treatment information.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

WARNING: NOT TO BE USED ON ANIMALS TO BE USED AS A SOURCE OF FOOD OR FEED

HUMANS: Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contamination of feed or foodstuffs. Wash hands with soap and water after using.

ANIMALS: Avoid contact with animal's eyes. Do not use on nursing animals. If treatment is necessary, spray on fingertips and rub into coat.

Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals.

Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product in or around electrical equipment due to possibility of shock hazard.

USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.

Do not use on horses or foals intended for slaughter.

Do not apply over cuts, wounds, or irritated skin.

Do not apply near eyes and mouth. Apply sparingly around ears.

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

Puppies and Kittens:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors.

Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.